"RENEWAL"

PERMITTEE

General Mills Operations, Inc.

Attn: Theodore M. Slavik, P.E., CHMM

704 West Washington Street West Chicago, Illinois 60185

<u>Application No.</u>: 96020117 <u>I.D. No.</u>: 043090AAF

<u>Applicant's Designation:</u>
<u>Operation of:</u> Breakfast Cereals, Prepared <u>Foods and Snack Foods Mfg. Plant Date Issued:</u> March 3, 2005 <u>Expiration Date²: March 3, 2010 Source Location:</u> 704 West Washington Street, West Chicago, DuPage County

Responsible Official: Chad Kerlin, Plant Manager

This permit is hereby granted to the above-designated Permittee to OPERATE a Breakfast Cereals Manufacturing Plant, pursuant to the above referenced permit application. This permit is subject to the conditions contained herein.

If you have any questions concerning this, please call Anatoly Belogorsky at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:AB:psj

cc: Illinois EPA, FOS, Region 1 USEPA

- This permit may contain terms and conditions which address the applicability, and compliance if determined applicable, of Title I of the CAA and regulations promulgated thereunder, including 40 CFR 52.21 federal PSD and 35 IAC Part 203 Major Stationary Sources Construction and Modification. Any such terms and conditions are identified within this permit.
- Except as provided in Condition 8.7 of this permit.

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1.0 SOURCE IDENTIFICATION

1.1 Source

General Mills Operations, Inc. 704 West Washington Street West Chicago, Illinois 60185 630/876-4041

I.D. No.: 043090AAF

Standard Industrial Classification: 2043, Breakfast Cereals 2099, Prepared Foods

2096, Snack Foods

1.2 Owner/Parent Company

General Mills, Inc.
1 General Mills Boulevard
Minneapolis, Minnesota 55426

1.3 Operator

General Mills Operations, Inc. 704 West Washington Street West Chicago, Illinois 60185

Contact Person Name: Theodore M. Slavik 630/876-4041

1.4 General Source Description of Source

General Mills Operations, Inc. is located at 704 West Washington Street in West Chicago and operates a breakfast cereal, snack foods, and prepared foods manufacturing plant. Breakfast cereals are made by using flours, sweeteners, colors, flavors and other ingredients depending on the recipe. Snacks are made by processing grain and other ingredients depending on the recipe. Prepared foods are made by mixing starches, seasonings and other ingredients depending on the recipe.

2.0 LIST OF ABBREVIATIONS/ACRONYMS USED IN THIS PERMIT

ACMA	Alternative Compliance Market Account			
Act	Environmental Protection Act [415 ILCS 5/1 et seq.]			
AP-42	Compilation of Air Pollution Emission Factors, Volume 1,			
	Stationary Point and Other Sources (and Supplements A			
	through E), USEPA, Office of Air Quality Planning and			
	Standards, Research Triangle Park, NC 27717			
ATUs	Allotment Trading Units			
BAT	Best Available Technology			
Btu	British thermal unit			
°C	degrees Celsius			
CAA	Clean Air Act [42 U.S.C. Section 7401 et seq.]			
CAAPP	Clean Air Act Permit Program			
cfm	cubic foot per minute			
CFR	Code of Federal Regulations			
CO	Carbon Monoxide			
°F	degrees Fahrenheit			
ft	feet			
ft ³	cubic foot			
g	grams			
gal	gallon			
gr	grains			
HAP	Hazardous Air Pollutant			
Нр	Horsepower			
hr	hour			
IAC	Illinois Administrative Code			
I.D. No.	Identification Number of Source, assigned by Illinois EPA			
Illinois EPA	Illinois Environmental Protection Agency			
kg	kilogram			
1	liter			
lb	pound			
LEL	Lower Explosive Limit			
m	meter			
MACT	Maximum Achievable Control Technology			
MBtu/hr	Million Btu per hour			
mg 	milligrams			
mmHg	millimeters of mercury			
mmHg mmscf	millimeters of mercury million standard cubic feet			
mmHg mmscf mo	millimeters of mercury million standard cubic feet month			
mmHg mmscf mo MW	millimeters of mercury million standard cubic feet month Megawatts			
mmHg mmscf mo MW NESHAP	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants			
mmHg mmscf mo MW NESHAP NSPS	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards			
mmHg mmscf mo MW NESHAP NSPS NO _x	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides			
mmHg mmscf mo MW NESHAP NSPS NO _x PIMW	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides Potentially Infectious Medical Wastes			
mmHg mmscf mo MW NESHAP NSPS NO _x PIMW PM	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides Potentially Infectious Medical Wastes Particulate Matter			
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mmHg mmscf mo MW NESHAP NSPS NO _x PIMW PM ppm PSD	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides Potentially Infectious Medical Wastes Particulate Matter Parts Per Million Prevention of Significant Deterioration			
mmHg mmscf mo MW NESHAP NSPS NO _x PIMW PM ppm PSD psia	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides Potentially Infectious Medical Wastes Particulate Matter Parts Per Million Prevention of Significant Deterioration pounds per square inch absolute			
mmHg mmscf mo MW NESHAP NSPS NO _x PIMW PM ppm PSD	millimeters of mercury million standard cubic feet month Megawatts National Emission Standards for Hazardous Air Pollutants New Source Performance Standards Nitrogen Oxides Potentially Infectious Medical Wastes Particulate Matter Parts Per Million Prevention of Significant Deterioration			

scm	standard cubic meters
SIC	Standard Industrial Classification
SO ₂	Sulfur Dioxide
Т	Tons
Т1	Title I - identifies Title I conditions that have been carried over from an existing construction permit
T1N	Title I New - identifies Title I conditions that are being established in this permit
T1R	Title I Revised - identifies Title I conditions that have been carried over from an existing construction permit and subsequently revised in this permit
TOC	Total Organic Compounds
USEPA	United States Environmental Protection Agency
VOC	Volatile Organic Compounds
VOL	Volatile Organic Liquid
MOV	Volatile Organic Material
wt.	weight
yr	year

3.0 INSIGNIFICANT ACTIVITIES

3.1 Identification of Insignificant Activities

The following activities at the source constitute insignificant activities as specified in 35 IAC 201.210:

3.1.1 Activities determined by the Illinois EPA to be insignificant activities, pursuant to 35 IAC 201.210(a)(1) and 201.211, as follows:

Underground Storage Tanks
Wastewater Pre-Treatment Equipment
Pest Control and Fumigation Activities
Trash compactors & other Sanitation Devices &
Activities

3.1.2 Activities that are insignificant activities based upon maximum emissions, pursuant to 35 IAC 201.210(a)(2) or (a)(3), as follows:

Grouped as follows:

- a. Other bins, receivers, bag dumps not listed in Section 7.1;
- b. Cookers not listed in Section 7.2;
- c. Cyclones;
- d. Laser coder daters;
- e. Conveyors, tote dumps, feeders, and other material transfer equipment;
- f. Fillers and other packaging equipment not listed in Section 7.9; and
- g. Vacuums not listed in Section 7.10.
- 3.1.3 Activities that are insignificant activities based upon their type or character, pursuant to 35 IAC 201.210(a)(4) through (18), as follows:
 - a. Direct combustion units designed and used for comfort heating purposes and fuel combustion emission units as follows: (A) Units with a rated heat input capacity of less than 2.5 MBtu/hr that fire only natural gas, propane, or liquefied petroleum gas; (B) Units with a rated heat input capacity of less than 1.0 MBtu/hr that fire only oil or oil in combination with only natural gas, propane, or liquefied petroleum gas; and (C) Units with a rated heat input capacity of less than 200,000 Btu/hr which never burn

- refuse, or treated or chemically contaminated wood [35 IAC 201.210(a)(4)].
- b. Equipment used for the melting or application of less than 50,000 lb/yr of wax to which no organic solvent has been added [35 IAC 201.210(a)(7)].
- c. Storage tanks of virgin or rerefined distillate oil, hydrocarbon condensate from natural gas pipeline or storage systems, lubricating oil, or residual fuel oils [35 IAC 201.210(a)(11].
- d. Printing operations with aggregate organic solvent usage that never exceeds 750 gallons per year from all printing lines at the source, including organic solvent from inks, diluents, fountain solutions, and cleaning materials [35 IAC 201.210(a)(14)].
- e. Gas turbines and stationary reciprocating internal combustion engines of less than 112 KW (150 horsepower) power output [35 IAC 201.210(a)(15)].
- f. Storage tanks of any size containing exclusively soaps, detergents, surfactants, glycerin, waxes, vegetable oils, greases, animal fats, sweeteners, corn syrup, aqueous salt solutions, or aqueous caustic solutions provided an organic solvent has not been mixed with such materials [35 IAC 201.210(a)(17)].
- g. Loading and unloading systems for railcars, tank trucks, or watercraft that handle only the following liquid materials provided an organic solvent has not been mixed with such materials: soaps, detergents, surfactants, lubricating oils, waxes, glycerin, vegetable oils, greases, animal fats, sweetener, corn syrup, aqueous salt solutions, or aqueous caustic solutions [35 IAC 201.210(a)(18)].
- 3.1.4 Activities that are considered insignificant activities pursuant to 35 IAC 201.210(b).
- 3.2 Compliance with Applicable Requirements
 - 3.2.1 For each cold cleaning degreaser, the Permittee shall comply with the applicable equipment and operating requirements of 35 IAC 215.182, 218.182, or 219.182.
 - 3.2.2 For each particulate matter process emission unit, the Permittee shall comply with the applicable particulate matter emission limit of 35 IAC 212.321 or 212.322. For example, the particulate matter emissions from a process emission unit shall not exceed 0.55 pounds per hour if the

- emission unit's process weight rate is 100 pounds per hour or less, pursuant to 35 IAC 266.110.
- 3.2.3 For each organic material emission unit that uses organic material, e.g., a mixer or printing line, the Permittee shall comply with the applicable VOM emission limit of 35 IAC 215.301, 218.301, or 219.301, which requires that organic material emissions not exceed 8.0 pounds per hour or do not qualify as photochemically reactive material as defined in 35 IAC 211.4690.
- 3.3 Addition of Insignificant Activities
 - 3.3.1 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type that is identified in Condition 3.1, until the renewal application for this permit is submitted, pursuant to 35 IAC 201.212(a).
 - 3.3.2 The Permittee must notify the Illinois EPA of any proposed addition of a new insignificant activity of a type addressed by 35 IAC 201.210(a) and 201.211 other than those identified in Condition 3.1, pursuant to Section 39.5(12)(b) of the Act.
 - 3.2.3 The Permittee is not required to notify the Illinois EPA of additional insignificant activities present at the source of a type identified in 35 IAC 201.210(b).

4.0 SIGNIFICANT EMISSION UNITS AT THIS SOURCE

Emission	Danish and the	D	Emission Control
Unit Group 1	Equipment Bins, Receivers and Hand Dumps	Description 22B, 26B, 27B, 46B, 28C, 30C, 16D, 17D, 15H, 37H-39H	Equipment Filter for Each Unit
Group 2	Cookers	28A, 35A, 36A, 10B, 11E	Wet Collectors
Group 3	Cyclone Receivers	13A, 14A, 31A, 14B, 15B, 29B, 13C, 14C, 22D, 26D, 19E, 20E	Filter for Each Unit
Group 4	Dryers and Coolers	7A - 12A, 15A, 16A, 21A, 22A, 29A, 30A, 32A, 33A, 12B, 13B, 23B, 42B, 10C - 12C, 19C, 20C, 18D, 21D, 28D, 34D	Filter and Wet Collectors, Mist Eliminator
Group 5	Dryers and Coolers (Natural Gas-Fired)	24B, 25B, 16C, 17C, 24D, 25D, 32D, 33D, 32E, 33E	Filters and Wet Collectors
Group 6	Enrobers and Slurry Systems	25A, 30B, 43E	Wet Collectors
Group 7	Fryers	19A, 20A	Mist Eliminator
Group 8	Material Transfer Units	47B - 49B, 35D, 43D, 44D, 25F, 47G, 51G, 52G, 34H - 36H	Filter for Each Unit
Group 9	Packaging Lines	34E, 35E, 40E, 1F, 3F, 4F, 9F - 11F, 13F - 24F	Filter for Each Unit
Group 10	Vacuums	37E, 35E, 12G, 13G, 14G, 17G	Filter for Each Unit
Group 11	Coating Lines	Coating Line B: 32B - 34B Coating Line D: 37D - 40D, 47D Coating Line E: 24E, 25E, 47E, 48E	Wet Collectors for Some Units
Group 12	Boilers	Three Natural Gas-Fired Boilers with Distillate Fuel Oil as Backup	None
Group 13	Cogeneration Engines	Eight Natural Gas-Fired Internal Combustion Reciprocating Engines	None

5.0 OVERALL SOURCE CONDITIONS

5.1 Source Description

5.1.1 This permit is issued based on the source requiring a CAAPP permit as a major source of VOM and PM_{10} emissions.

5.2 Applicable Regulations

- 5.2.1 Specific emission units at this source are subject to particular regulations as set forth in Section 7 (Unit-Specific Conditions) of this permit.
- 5.2.2 In addition, emission units at this source are subject to the following regulations of general applicability:
 - a. No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally overhead at a point beyond the property line of the source unless the wind speed is greater than 40.2 kilometers per hour (25 miles per hour), pursuant to 35 IAC 212.301 and 212.314.
 - b. No person shall cause or allow the emission of smoke or other particulate matter, with an opacity greater than 30 percent, into the atmosphere from any emission unit other than those emission units subject to the requirements of 35 IAC 212.122, pursuant to 35 IAC 212.123(a), except as allowed by 35 IAC 212.123(b) and 35 IAC 212.124.

5.2.3 Ozone Depleting Substances

The Permittee shall comply with the standards for recycling and emissions reduction of ozone depleting substances pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners in Subpart B of 40 CFR Part 82:

- a. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- b. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- c. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

5.2.4 Risk Management Plan

Should this stationary source, as defined in 40 CFR Section 68.3, become subject to the Accidental Release Prevention regulations in 40 CFR Part 68, then the owner or operator shall submit [40 CFR 68.215(a)(2)(i) and (ii)]:

- a. A compliance schedule for meeting the requirements of 40 CFR Part 68 by the date provided in 40 CFR 68.10(a); or
- b. A certification statement that the source is in compliance with all requirements of 40 CFR Part 68, including the registration and submission of the Risk Management Plan (RMP), as part of the annual compliance certification required by 40 CFR Part 70 or 71.
- 5.2.5 a. Should this stationary source become subject to a regulation under 40 CFR Parts 60, 61, or 63, or 35 IAC after the date issued of this permit, then the owner or operator shall, in accordance with the applicable regulation(s), comply with the applicable requirements by the date(s) specified and shall certify compliance with the applicable requirements of such regulation(s) as part of the annual compliance certification, as required by 40 CFR Part 70 or 71.
 - b. No later than upon the submittal for renewal of this permit, the owner or operator shall submit, as part of an application, the necessary information to address either the non-applicability of, or demonstrate compliance with all applicable requirements of any potentially applicable regulation which was promulgated after the date issued of this permit.

5.2.6 Episode Action Plan

- a. If the source is required to have an episode action plan pursuant to 35 IAC 244.142, the Permittee shall maintain at the source and have on file with the Illinois EPA a written episode action plan (plan) for reducing the levels of emissions during yellow alerts, red alerts, and emergencies, consistent with safe operating procedures. The plan shall contain the information specified in 35 IAC 244.144.
- b. The Permittee shall immediately implement the appropriate steps described in this plan should an air pollution alert or emergency be declared.

- c. If a change occurs at the source which requires a revision of the plan (e.g., operational change, change in the source contact person), a copy of the revised plan shall be submitted to the Illinois EPA for review within 30 days of the change. Such plans shall be further revised if disapproved by the Illinois EPA.
- d. For sources required to have a plan pursuant to 35 IAC 244.142, a copy of the original plan and any subsequent revisions shall be sent to:

Illinois Environmental Protection Agency Compliance and Enforcement Section.

5.2.7 CAM Plan

This stationary source is not subject to 40 CFR Part 64, Compliance Assurance Monitoring (CAM) for Major Stationary Sources, because the applicability criteria of 40 CFR 64.2 (a)(3) is not met for any of each individual emission unit at this source.

5.3 Non-Applicability of Regulations of Concern

None

5.4 Source-Wide Operational and Production Limits and Work Practices

In addition to the source-wide requirements in the Standard Permit Conditions in Section 9, the Permittee shall fulfill the following source-wide operational and production limitations and/or work practice requirements:

None

5.5 Source-Wide Emission Limitations

5.5.1 Permitted Emissions for Fees

The annual emissions from the source, not considering insignificant activities as addressed by Section 3.0 of this permit, shall not exceed the following limitations. The overall source emissions shall be determined by adding emissions from all emission units. Compliance with these limits shall be determined on a calendar year basis. These limitations (Condition 5.5.1) are set for the purpose of establishing fees and are not federally enforceable.

Permitted Emissions of Regulated Pollutants

Pollutant	Tons/Year
Volatile Organic Material (VOM)	57.26
Sulfur Dioxide (SO ₂)	59.11
Particulate Matter (PM)	125.41
Nitrogen Oxides (NO_x)	87.03
HAP, not included in VOM or PM	
Total	328.81

5.5.2 Emissions of Hazardous Air Pollutants

The emissions of HAPs from the source shall be less than 10 tons/year for each individual HAP and 25 tons/year for all HAPs combined. Compliance with these limits shall be based on a running total of 12 months of data, with emissions calculated using standard USEPA methodology, e.g., by appropriately summing the product of the vapor weight percent of each HAP in the VOM emissions for each organic liquid and the VOM emissions attributable to the storage and handling of that liquid, as determined by the current version of the TANKS program.

This condition is being imposed so that the source is not a major source of HAP emissions.

5.5.3 Other Source-Wide Emission Limitations

Other source-wide emission limitations are not set for this source pursuant to either the federal rules for Prevention of Significant Deterioration (PSD), 40 CFR 52.21, Illinois EPA rules for Major Stationary Sources Construction and Modification, 35 IAC Part 203, or Section 502(b)(10) of the CAA. However, there may be unit specific emission limitations set forth in Section 7 of this permit pursuant to these rules.

5.6 General Recordkeeping Requirements

5.6.1 Emission Records

The Permittee shall maintain records of the following items for the source to demonstrate compliance with Condition 5.5.1, pursuant to Section 39.5(7)(b) of the Act:

- a. Total annual emissions on a calendar year basis for the emission units covered by Section 7 (Unit Specific Conditions) of this permit.
- b. Total plant-wide natural gas usage in terms of mmscf/mo and mmscf/yr.

5.6.2 Retention and Availability of Records

- a. All records and logs required by this permit shall be retained for at least five years from the date of entry (unless a longer retention period is specified by the particular recordkeeping provision herein), shall be kept at a location at the source that is readily accessible to the Illinois EPA or USEPA, and shall be made available for inspection and copying by the Illinois EPA or USEPA upon request.
- b. The Permittee shall retrieve and print, on paper during normal source office hours, any records retained in an electronic format (e.g., computer) in response to an Illinois EPA or USEPA request for records during the course of a source inspection.

5.7 General Reporting Requirements

5.7.1 General Source-Wide Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the permit requirements as follows, pursuant to Section 39.5(7)(f)(ii) of the Act. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

5.7.2 Annual Emissions Report

The annual emissions report required pursuant to Condition 9.7 shall contain emissions information for the previous calendar year.

5.7.3 Annual Reporting of HAP Emissions

The Permittee shall submit an annual report to the Illinois EPA, Compliance and Enforcement Section, on HAP emissions from the source, including the following information, so as to demonstrate whether the source is being operated as a non-major source of HAP emissions. This report shall be submitted with the Annual Emissions Report (Condition 9.7).

a. The annual emissions of individual HAPs for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all); and

- b. The total annual emissions of all HAPs combined for each month of the previous calendar year sufficient to demonstrate compliance with the 12 month running total of Condition 5.5.2, tons/year, (e.g., for the month of January, the emissions from February of the preceding calendar year through January; for the month of February, the emissions from March of the preceding calendar year through February; 12 months in all).
- 5.8 General Operational Flexibility/Anticipated Operating Scenarios

The Permittee is granted the following operational flexibility, provided records are kept of the nature, date and emissions results and provided the facility net emissions do not exceed those established in Sections 5 and 7 of this permit:

- a. The Permittee may substitute, change or add any food grade ingredient to any of its manufacturing processes.
- b. The Permittee may add equipment or modify its operation to manufacture under a different SIC code than listed in Section 1, provided that other relevant requirements of this permit are met.
- c. The Permittee may move, modify or replace any equipment considered to be part of its process. The Permittee may move, modify or replace any pollution control device provided the emissions from the new or modified control device are the same or less than prior to such modification/replacement and still in compliance with applicable emission limits listed in Section 7.
- d. The Permittee may add dust collection systems to equipment currently classified as an insignificant activity to improve sanitation and collect materials that are normally swept up or otherwise collected.
- e. The Permittee shall apply for revision of this permit considering any internal "trade" of emissions between emission units and resulting increase/decrease of emission levels for certain units established in Section 7.
- 5.9 General Compliance Procedures
 - 5.9.1 General Procedures for Calculating Allowable Emissions

Compliance with the source-wide emission limits specified in Condition 5.5.1 shall be based on the recordkeeping and reporting requirements of Conditions 5.6 and 5.7, and Compliance Procedures in Section 7 (Unit-Specific Conditions) of this permit.

5.10 Construction Permits Revisions

The conditions of construction permits referenced in Section 7 of this CAAPP have been revised to reflect the following:

- a. Pursuant to the USEPA memorandum from October 16, 1995, emissions of PM_{10} but not TSP (total suspended particles) be considered for Title V applicability. Therefore, all construction permits previously issued to General Mills Operations, Inc. revised to reflect the change of the regulated air pollutant from TSP to PM_{10} .
- b. The emission limitations established in Section 7 of this CAAPP reflect the grouping of emission units and emissions from appropriate construction permits.

6.0 EMISSION REDUCTION MARKET SYSTEM (ERMS)

6.1 Description of ERMS

The ERMS is a "cap and trade" market system for major stationary sources located in the Chicago ozone nonattainment area. It is designed to reduce VOM emissions from stationary sources to contribute to further reasonable progress toward attainment, as required by Section 182(c) of the Clean Air Act.

The ERMS addresses VOM emissions during a seasonal allotment period from May 1 through September 30. Under the ERMS, participating sources must hold "allotment trading units" (ATUs) for their actual seasonal VOM emissions. Each year participating sources are issued ATUs based on allotments set during initial issuance of the sources' CAAPP permit. These allotments are established from historical VOM emissions or "baseline emissions" lowered to provide the emission reduction from stationary sources required for further progress.

By December 31 of each year, the end of the reconciliation period following the seasonal allotment period, each source should have sufficient ATUs in its account to cover its actual VOM emissions during the preceding season. An account's balance as of December 31 will include any valid ATU transfer agreements entered into as of December 31 of the given year, provided such agreements are promptly submitted to the Illinois EPA for entry into the account database. The Illinois EPA will then retire ATUs in sources' accounts in amounts equivalent to their seasonal emissions. When a source does not appear to have sufficient ATUs in its account, the Illinois EPA will issue a notice to the source to begin the process for Emissions Excursion Compensation.

In addition to receiving ATUs pursuant to their allotments, participating sources may also obtain ATUs from the market, including ATUs bought from other participating sources and general participants in the ERMS that hold ATUs (35 IAC 205.630) and ATUs issued by the Illinois EPA as a consequence of VOM emission reductions from an Emission Reduction Generator or an Intersector Transaction (35 IAC 205.500 and 205.510). During the reconciliation period, sources may also buy ATUs from a secondary reserve of ATUs managed by the Illinois EPA, the Alternative Compliance Market Account (35 IAC 205.710). A source may also transfer or sell the ATUs that it holds to other sources or participants (35 IAC 205.630).

6.2 Applicability

This source is considered a "participating source" for purposes of the ERMS, 35 IAC Part 205.

- 6.3 Obligation to Hold Allotment Trading Units (ATUs)
 - a. Pursuant to 35 IAC 205.150(c)(1) and 205.720, and as further addressed by Condition 6.8, as of December 31 of each year, this source shall hold ATUs in its account in an amount not less than its VOM emissions during the preceding seasonal allotment period (May 1 September 30) not including VOM emissions from the following, or the source shall be subject to "emissions excursion compensation," as described in Condition 6.5.
 - i. VOM emissions from insignificant units and activities as identified in Section 3 of this permit, in accordance with 35 IAC 205.220;
 - ii. Excess VOM emissions associated with startup, malfunction or breakdown of an emission unit as authorized elsewhere in this permit, in accordance with 35 IAC 205.225;
 - iii. Excess VOM emissions to the extent allowed by a Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3);
 - iv. Excess VOM emissions that are a consequence of an emergency as approved by the Illinois EPA, pursuant to 35 IAC 205.750; and
 - v. VOM emissions from certain new and modified emission units as addressed by Section 6.8(b), if applicable, in accordance with 35 IAC 205.320(f).
 - b. Notwithstanding the above condition, in accordance with 35 IAC 205.150(c)(2), if a source commences operation of a major modification pursuant to 35 IAC Part 203, the source shall hold ATUs in an amount not less than 1.3 times its VOM emissions attributable to such major modification during the seasonal allotment period, determined in accordance with the construction permit for such major modification or applicable provisions in Section 7.0 of this permit.

6.4 Market Transaction

- a. The source shall apply to the Illinois EPA, and obtain a Transaction Account prior to conducting any market transactions, pursuant to 35 IAC 205.610(a).
- b. The Permittee shall promptly submit to the Illinois EPA any revisions to the information submitted for its Transaction Account, pursuant to 35 IAC 205.610(b).

- c. The source shall have at least one account officer designated for its Transaction Account, pursuant to 35 IAC 205.620(a).
- d. Any transfer of ATUs to or from the source from another source or general participant must be authorized by a qualified Account Officer designated by the source and approved by the Illinois EPA in accordance with 35 IAC 205.620 and the transfer must be submitted to the Illinois EPA for entry into the Transaction Account database.

6.5 Emission Excursion Compensation

Pursuant to 35 IAC 205.720, if the source fails to hold ATUs in accordance with Condition 6.3, it shall provide emissions excursion compensation to the Illinois EPA in accordance with the following:

- a. Upon receipt of an Excursion Compensation Notice issued by the Illinois EPA, the source shall purchase ATUs from the ACMA in the amount specified by notice, as follows:
 - i. The purchase of ATUs shall be in an amount equivalent to 1.2 times the emissions excursion; or
 - ii. If the source had an emissions excursion for the seasonal allotment period immediately before the period for the present emission excursion, the source shall purchase ATUs in an amount equivalent to 1.5 times the emissions excursion.
- b. If requested in accordance with paragraph (c) below or in the event that the ACMA balance is not adequate to cover the total emissions excursion amount, the Illinois EPA will deduct ATUs equivalent to the specified amount or any remaining portion thereof from the ATUs to be issued to the source for the next seasonal allotment period.
- c. Pursuant to 35 IAC 205.720(c), within 15 days of receipt of an Excursion Compensation Notice, the owner or operator may request that ATUs equivalent to the amount specified be deducted from the source's next seasonal allotment by the Illinois EPA, rather than purchased from the ACMA.

6.6 Quantification of Seasonal VOM Emissions

a. The methods and procedures specified in Section 5 and 7 of this permit for determining VOM emissions and compliance with VOM emission limitations shall be used for determining seasonal VOM emissions for purposes of the ERMS, with the following exceptions [35 IAC 205.315(b)]:

No exceptions

- b. The Permittee shall report emergency conditions at the source to the Illinois EPA in accordance with 35 IAC 205.750, if the Permittee intends to deduct VOM emissions in excess of the technology-based emission rates normally achieved that are attributable to the emergency from the source's seasonal VOM emissions for purposes of the ERMS. These reports shall include the information specified by 35 IAC 205.750(a), and shall be submitted in accordance with the following:
 - i. An initial emergency condition report within two days of the time when such excess emissions occurred due to the emergency; and
 - ii. A final emergency condition report, if needed to supplement the initial report, within 10 days after the conclusion of the emergency.

6.7 Annual Account Reporting

- a. For each year in which the source is operational, the Permittee shall submit, as a component of its Annual Emission Report, seasonal VOM emission information to the Illinois EPA for the seasonal allotment period. This report shall include the following information [35 IAC 205.300]:
 - i. Actual seasonal emissions of VOM from the source;
 - ii. A description of the methods and practices used to determine VOM emissions, as required by this permit, including any supporting documentation and calculations;
 - iii. A detailed description of any monitoring methods that differ from the methods specified in this permit, as provided in 35 IAC Section 205.337;
 - iv. If a source has experienced an emergency, as provided in 35 IAC 205.750, the report shall reference the associated emergency conditions report that has been approved by the Illinois EPA;
 - v. If a source's baseline emissions have been adjusted due to a variance, consent order or CAAPP permit compliance schedule, as provided for in 35 IAC 205.320(e)(3), the report shall provide documentation quantifying the excess VOM emissions during the season that were allowed by the Variance, Consent Order, or Compliance Schedule, in accordance with 35 IAC 205.320(e)(3); and
 - vi. If a source is operating a new or modified emission unit for which three years of operational data are

not yet available, as specified in 35 IAC 205.320(f), the report shall specify seasonal VOM emissions attributable to the new emission unit or the modification of the emission unit.

- b. This report shall be submitted by October 31 of each year, for the preceding seasonal allotment period.
- 6.8 Allotment of ATUs to the Source
 - a. i. The allotment of ATUs to this source is 183 ATUs per seasonal allotment period.
 - ii. This allotment of ATUs reflects the Illinois EPA's determination that the source's baseline emissions were 18.5246 tons and a permanent transfer of 19 ATUs from an Emission Reduction Generator transfer agreement.
 - iii. The source's allotment reflects 88% of the baseline emissions (12% reduction) except for the VOM emissions from specific emission unit excluded from such reduction pursuant to 35 IAC 205.405 including units complying with MACT or using BAT, as identified in Section 7 of this permit.
 - iv. ATUs will be issued to the source's Transaction Account by the Illinois EPA annually. These ATUs will be valid for the seasonal allotment period following issuance and, if not retired in this season, the next seasonal allotment period.
 - v. Condition 6.3(a) becomes effective beginning in the seasonal allotment period following the initial issuance of ATUs by the Illinois EPA into the Transaction Account for the source.
 - b. Contingent Allotments for New or Modified Emission Units.

The source was not issued a construction permit prior to January 1, 1998 for the following new or modified emission units for which three years of operational data is not yet available:

None

- c. Notwithstanding the above, part or all of the above ATUs will not be issued to the source in circumstances as set forth in 35 IAC Part 205, including:
 - i. Transfer of ATUs by the source to another participant or the ACMA, in accordance with 35 IAC 205.630;

- ii. Deduction of ATUs from the allotment as a consequence of emission excursion compensation, in accordance with 35 IAC 205.720; and
- iii. Transfer of ATUs from the allotment to the ACMA, as a consequence of shutdown of the source, in accordance with 35 IAC 205.410.

6.9 Recordkeeping for ERMS

The Permittee shall maintain copies of the following documents as its Compliance Master File for purposes of ERMS [35 IAC 205.700(a)]:

- a. Seasonal component of the Annual Emission Report;
- b. Information on actual VOM emissions, as specified in detail in Sections 5 and 7 of this permit and Condition 6.6(a); and
- c. Any transfer agreements for the purchase or sale of ATUs and other documentation associated with the transfer of ATUs.

6.10 Federal Enforceability

Section 6 becomes federally enforceable upon approval of the ERMS by USEPA as part of Illinois' State Implementation Plan.

6.11 Exclusion from Further Reduction

- a. VOM emissions from the following emission units, if satisfying subsection (a)(1), (a)(2), or (a)(3) prior to May 1, 1999, shall be excluded from the VOM emissions reduction requirements specified in 35 IAC 205.400(c) and (e) as long as such emission units continue to satisfy subsection (a)(1), (a)(2), or (a)(3) [35 IAC 205.405(a)]:
 - i. Emission units that comply with any NESHAP or MACT standard promulgated pursuant to the CAA;
 - ii. Direct combustion emission units designed and used for comfort heating purposes, fuel combustion emission units and internal combustion engines; and
 - iii. An emission unit for which a LAER demonstration has been approved by the Illinois EPA on or after November 15, 1990.

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies for exclusion from further reductions because they meet the criteria as indicated above [35 IAC 205.400(a) and (c)]:

Boilers and Cogeneration Engines

b. VOM emissions from the emission units using BAT for controlling VOM emissions, prior to May 1, 1999, shall not be subject to the VOM emissions reduction requirements specified in 35 IAC 205.400(c) or (e) as long as such emission unit continues to use such BAT [35 IAC 205.405(b)].

The source has demonstrated in their ERMS application and the Illinois EPA has determined that the following emission units qualifies from further reductions because these emission units use BAT for controlling VOM emissions as indicated above [35 IAC 205.400(b) and (c)]:

None

7.0 UNIT SPECIFIC CONDITIONS

7.1 Group 1: Bins, and Receivers

7.1.1 Description

Bins, and receivers are containers into which raw materials are mechanically or manually conveyed.

7.1.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 1	Bins, Receivers	Equipment Point Numbers:	
	and Hand Dumps	<u>System B</u> : 22B, 26B, 27B, 46B	Fabric Filter for Each Unit
		<u>System C</u> : 28C, 30C	Fabric Filter for Each Unit
		<u>System D</u> : 16D, 17D	Fabric Filter for Each Unit
		<u>System H</u> : 15H, 37H-39H	Fabric Filter for Each Unit
		Construction Dates:	
		System B: 1968 - 1995	
		System C: 1964 - 1997 System D: 1964 - 1997	
		System H: 1964 - 1994	

7.1.3 Applicability Provisions and Applicable Regulations

- a. An "affected bin/receiver" for the purpose of these unit specific conditions is a container into which raw materials are mechanically or manually conveyed.
- b. Each affected bin/receiver is subject either to 35 IAC 212.321(b)(1) or 35 IAC 212.322(b)(1), which provide that:
 - i. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified

in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

- ii. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].
- c. Each affected bin/receiver is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.1.4 Non-Applicability of Regulations of Concern

None

7.1.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.1.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, an affected bin/receiver is subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. <u>94070021</u>

	Hours of	PM/PI	M_{10}
Item of	Operation	Emiss	ions
Equipment	(Hr/Yr)	(Lb/Hr)	(T/Yr)
		•	
Bins (15H)	8,160	0.2	0.8
Receivers (37H-39H)	8,160	0.33	1.35

ii. <u>95080029</u>

Conveyor (46B)

iii.

Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr) (T/Yr)
Receivers (22B, 26B-27B)	8,160	0.3 1.22
02050057		
Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr) (T/Yr)
Receiver and		

8,160

0.2

0.8

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual \mbox{PM}/\mbox{PM}_{10} emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.1.7 Testing Requirements

None

7.1.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.1.5 and by keeping appropriate records of Condition 7.1.9.

7.1.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected bin/receiver to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total material throughput for each System, in terms of T/month and T/year.
- b. Hours of operation of each System, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of filters, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in 7.1.6(a) as calculated in accordance with compliance procedures in Condition 7.1.12.
- Total monthly and annual emissions of particulate matter for the entire Group 1 as calculated in accordance with compliance procedures in Condition 7.1.12.

7.1.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.1.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.1.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the dust collectors as required by this section and the work-practices inherent in operation of the affected bins/receivers.
- b. To determine compliance with Conditions 5.5.1 and 7.1.6, emissions of PM_{10} from the affected bins/receivers/hand dumps shall be calculated based on the following:

 PM_{10} Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.2 Group 2: Cookers

7.2.1 Description

Cookers are equipment in which raw materials are cooked as part of the manufacturing process.

7.2.2 List of Emission Units and Pollution Control Equipment

			Emission
Emission			Control
Unit	Equipment	Description	Equipment
Group 2	Cookers	Equipment Point Numbers:	
		<u>System A</u> : 28A, 34A, 35A	Wet Collectors For Each Unit
		System B: 10B	Wet Collector
		System E: 11E	Wet Collector
		Date of Construction:	
		System A: 1964 - 1992 System B: 1987 System E: 1990	

7.2.3 Applicability Provisions and Applicable Regulations

- a. An "affected cooker" for the purpose of these unit specific conditions is a unit in which raw materials are cooked as part of the manufacturing process.
- b. Each affected cooker (except one unit from System A) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Affected cooker from System A is subject to 35 IAC
212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

d. Each affected cooker is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.2.4 Non-Applicability of Regulations of Concern

None

7.2.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for wet collectors, including periodic inspection, routine maintenance and prompt repair of defects.

7.2.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, an affected cooker is subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 88100082

	Hours of	PM/I	PM_{10}	IOV	M
Item of	Operation	Emiss	sions	Emiss	sions
Equipment	(Hr/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
Cookers (10B)	8,160	0.3	1.00	0.1	0.44

ii. 95040076

	Hours of	PM/PM_{10}	VOM	
Item of	Operation	Emissions	Emissions	
Equipment	(Hr/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr)(T/Yr)	
Cookers (11E)	8,160	0.1 0.44	0.1 0.44	

iii. 96020139

	Hours of	PM/	PM_{10}	MOV	
Item of	Operation	Emis	sions	Emissio	ons
Equipment	(Hr/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
		,			
Cookers (34A/3	5A) 8,160	0.84	2.28	0.1	0.44

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM_{10} emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.2.7 Testing Requirements

None

7.2.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.2.5 and by keeping appropriate records of Condition 7.2.9.

7.2.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected cookers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Raw material throughput for each cooker, in terms of T/month and T/year.
- b. Hours of operation of each cooker, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of air pollution control devices with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of air pollution control device(s), with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in 7.2.6(a) as calculated in accordance with compliance procedures in Condition 7.2.12.
- f. Total monthly and annual emissions of particulate matter for the entire Group 2 as calculated in accordance with compliance procedures in Condition 7.2.12.

7.2.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.2.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.2.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the scrubbers and filter as required by this section and the work-practices inherent in operation of the affected cookers.
- b. To determine compliance with Conditions 5.5.1 and 7.2.6, emissions of PM from the affected cookers shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.3 Group 3: Cyclone Receivers

7.3.1 Description

Cyclone receivers are cyclones into which raw materials are conveyed.

7.3.2 List of Emission Units and Pollution Control Equipment

		Emission Control
Equipment		Equipment
Cyclone Receivers	Equipment Point Numbers:	
	<pre>System A: 13A (2 Units), 14A (5 Units), 31A</pre>	Fabric Filter for Each Unit
	<pre>System B: 14B (5 Units), 15B (2 Units), 29B (5 Units)</pre>	Fabric Filter for 14B, 15B
	<u>System C</u> : 13C, 14C	Fabric Filter
	System D: 22D (2 Units), 26D	Fabric Filter for Each Unit
	<pre>System E: 19E, 20E (2 Units)</pre>	Fabric Filter for Each Unit
	Date of Construction:	
	System A: 1988-1992	
	=	
	-	Cyclone Receivers Equipment Point Numbers: System A: 13A (2 Units), 14A (5 Units), 31A System B: 14B (5 Units), 15B (2 Units), 29B (5 Units) System C: 13C, 14C System D: 22D (2 Units), 26D System E: 19E, 20E (2 Units) Date of Construction:

7.3.3 Applicability Provisions and Applicable Regulations

- a. An "affected cyclone receiver" for the purpose of these unit specific conditions is a unit into which raw materials are conveyed.
- b. Each affected cyclone receiver (except one from System D) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or

after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Affected cyclone receiver (from System D) is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

d. Each cyclone receiver is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.3.4 Non-Applicability of Regulations of Concern

None

7.3.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.3.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected cyclone receivers are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. <u>94030067</u>

	Hours of	PM/PM_{10}
Item of	Operation	Emissions
Equipment	(Hr/Yr)	(Lb/Hr)(T/Yr)
Receivers		
(19E, 20E)	8,160	0.2 0.8

ii. 96020140

		Hours of	PM/PM_{10}
Item of		Operation	Emissions
Equipment		(Hr/Yr)	(Lb/Hr)(T/Yr)
Receivers	(29B)	8,160	0.3 1.0

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the conditions of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM_{10} emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.3.7 Testing Requirements

None

7.3.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.3.5 and by keeping appropriate records of Condition 7.3.9.

7.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected cyclone receivers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total raw material throughput, in terms of T/month and T/year.
- b. Hours of operation of each cyclone receiver, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of air pollution control device(s) with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of air pollution control device(s), with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in 7.3.6(a) as calculated in accordance with compliance procedures in Condition 7.3.12.
- f. Total monthly and annual emissions of particulate matter for the entire Group 3 as calculated in accordance with compliance procedures in Condition 7.3.12.

7.3.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of

the exceedance or violation and efforts to reduce emissions and future occurrences.

7.3.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.3.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected cyclone receivers.
- b. To determine compliance with Conditions 5.5.1 and 7.3.6, emissions of PM from the affected cyclone receivers shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.4 Group 4: Dryers and Coolers

7.4.1 Description

Dryers and coolers are equipment for drying and cooling product during the manufacturing process.

7.4.2 List of Emission Units and Pollution Control Equipment

		T	
			Emission
Emission			Control
Unit	Equipment	Description	Equipment
Group 4	Dryers and Coolers	Equipment Point Numbers:	
		System A: 7A-12A, 15A, 16A, 21A, 22A, 29A, 30A, 32A, 33A	Mist Eliminator
			for 21A and 22A
		<u>System B</u> : 12B, 13B, 23B, 33B, 34B, 39B, 42B	Wet Collector for 23B. Fabric Filter for 42B
		<u>System C</u> : 10C-12C, 17C, 18C, 19C, 20C	Fabric Filter for 10C - 12C
		<u>System D</u> : 18D, 21D, 28D, 34D	Fabric Filter for 18D, 21D
		Date of Construction:	
		System A: 1980 - 1992	
		System B: 1982, 1995, 1998, 2002	
		System C: 1964 - 1985	
		System D: 1964, 1976, 1992	

7.4.3 Applicability Provisions and Applicable Regulations

- a. An "affected dryer/cooler" for the purpose of these unit specific conditions is equipment for drying and cooling product during the manufacturing process.
- b. Each affected dryer/cooler (except of one unit from System D) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission

unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. An affected dryer/cooler from System D1 is subject to 35 IAC 212.322(b)(1), which provides that

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

7.4.4 Non-Applicability of Regulations of Concern

None

7.4.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for air pollution control device, including periodic inspection, routine maintenance and prompt repair of defects.

7.4.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected dryers/coolers are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 95050125

	Hours of	PM/P	M_{10}	MOV	
Item of	Operation	Emiss	ions	Emiss	sions
Equipment	(Hr/Yr)	(Lb/Hr	(T/Yr)	(Lb/Hr)	(T/Yr)
Cooler (23B) 8,160	0.4	1.63	0.1	0.44

ii. 02050057

	Hours of	PM/PM_{10}	MOV
Item of	Operation	Emissions	Emissions
Equipment	(Hr/Yr)	(Lb/Hr) (T/Yr)	(Lb/Hr) (Lb/Hr)
		'	
Dryer K (42B)	8.160	0.4 1.63	0 1 0 44

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in this permit that allow various refinements from the condition of this construction permit, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM₁₀ emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.4.7 Testing Requirements

None

7.4.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.4.5 and by keeping appropriate records of Condition 7.4.9.

7.4.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected dryers/coolers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total material throughput, in terms of T/month and T/year.
- b. Hours of operation of each dryer/cooler, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of filters, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in 7.4.6(a) and calculated in accordance with compliance procedures in Condition 7.4.12.
- f. Total monthly and annual emissions of particulate matter for the entire Group 4 and calculated in accordance with compliance procedures in Condition 7.4.12.

7.4.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.4.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.4.12 Compliance Procedures

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected dryers/coolers.

b. To determine compliance with Condition 5.5.1, emissions of PM from the affected dryers/coolers shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.5 Group 5: Dryers and Coolers (natural gas-fired)

7.5.1 Description

Natural gas-fired dryers and coolers are equipment for drying and cooling product during the manufacturing process.

7.5.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 5	Dryers and Coolers	Equipment Point Numbers:	
	(Natural Gas Fired)	<u>Systems B & C</u> : 24B, 25B, 16C, 17C	Wet Collector for 24B and 25B
		System D: 24D, 25D, 32D, 33D	Fabric Filter for 24D, 25D; Wet Collector for 32D,33D
		<u>System E</u> : 32E, 33E	None
		Date of Construction:	
		Systems B & C: 1974, 1983, 1995	
		System D: 1964 & 1989 System E: 1994	

7.5.3 Applicability Provisions and Applicable Regulations

- a. An "affected natural gas-fired dryer/cooler" for the purpose of these unit specific conditions is an equipment for drying and cooling product during the manufacturing process.
- b. Each affected natural gas-fired dryer/cooler (except one unit from System D) is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified

in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. An affected natural gas-fired dryer/cooler from System D is subject to 35 IAC 212.322(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any process emission unit for which construction or modification commenced prior to April 14, 1972, which either alone or in combination with the emission of particulate matter from all other similar process emission units at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 (See also Attachment 2) [35 IAC 212.322(a)].

- 7.5.4 Non-Applicability of Regulations of Concern
 - a. Each affected natural gas-fired dryer/cooler is not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the affected dryer/cooler is not by definition a fuel combustion emission unit.
 - b. Each affected natural gas-fired dryer/cooler is not subject to 35 IAC 217.121, Emissions of Nitrogen Oxides from New Fuel Combustion Emission Units, because the affected dryer/cooler is not by definition a fuel combustion emission unit.
- 7.5.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters and wet scrubbers, including periodic inspection, routine maintenance and prompt repair of defects.

7.5.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected natural gas-fired dryers/coolers are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. <u>93070098</u>

	·-					
	Item of Equipment	Hours o Operati (Hr/Yr	on E	PM/PM ₁₀ Emissior D/Hr) (T		
	Dryers (32D, 33D)	8,160	1.2	10 4	1.45	
	Item of Equipment	VOM Emissic (Lb/Yr) (T		NOx Emissi Lb/Hr)		
	Dryers (32D, 33D)	0.1	0.44	0.5	2.0	4
ii.	94030067					
	Item of	Hours of Operation (Hr/Yr)	Emissi	.ons	NO, Emissi (Lb/Hr) (ons
	Dryers (32E, 33E)	8,160	1.19	4.85	0.2	0.81
		ours of Operation (Hr/Yr)		ons.		
	Dryers (32E, 33E)	8,160	0.1	0.44		
iii.	95050125					
	Item of Equipment	Hours of Operation (Hr/Yr)	Emis	PM ₁₀ ssions () (T/Yr)		O _x ssions c)(T/Yr)
	Dryers (24B, 25B)	8,160	0.80	3.26	0.8	3.26
	<u>Equipment</u>	Hours of Operation (Hr/Yr)	ı Em	VOM nissions Hr)(T/Y		

b. The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in these permits that allow various refinements from the condition of these construction

(24B, 25B) 8,160 0.1 0.44

Dryers

permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the $% \frac{1}{2}\left(\frac{1}{2}\right) =\frac{1}{2}\left(\frac{1}{2}\right) +\frac{1}{2}\left(\frac{1}{2}\right) +\frac$ equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM_{10} and NO_x emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.5.7 Testing Requirements

None

7.5.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.5.5 and by keeping appropriate records of Condition 7.5.9.

7.5.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected gas-fired dryers/coolers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total material throughput, in terms of T/month and T/year.
- b. Hours of operation of each dryer/cooler, in terms of hr/mo and hr/yr.
- c. Total natural gas usage for all dryers, in terms mmscf/mo and mmscf/yr. Such records can be deviated by subtracting out the natural gas usage for boilers (Group 13) and cogeneration engines (Group 14) from the total plant-wide natural gas usage.
- d. Records for periodic inspection of the filters and wet scrubbers with date, individual performing the inspection, and nature of inspection.

- e. Records of prompt repair of defects of air pollution control equipment, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- f. Monthly and annual emissions of particulate matter and NO_x for process emission units described in 7.5.6(a) and calculated in accordance with compliance procedures in Condition 7.5.12.
- g. Total monthly and annual emissions of particulate matter and NO_{x} for the entire Group 5 and calculated in accordance with compliance procedures in Condition 7.5.12.

7.5.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.5.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.5.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters and wet collectors as required by this section and the work-practices inherent in operation of the affected gasfired dryers/coolers.
- b. To determine compliance with Conditions 5.5.1 and 7.5.6, emissions of PM from the affected gas-fired dryers/coolers shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

- * As specified by manufacturer or vendor of the filter or wet collector, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.
- c. Compliance with the emission limits established in Conditions 5.5.1 and 7.5.6 for natural gas fired dryers shall be based on the recordkeeping requirements in Condition 7.5.9 and the emission factors and formulas listed below:

	Natural Gas
	Emission Factors
Pollutant	$(1b/10^6 \text{ ft}^3)$
PM	7.6
NO_x	100
SO_2	0.6
VOM	5.5

These are the emission factors for uncontrolled natural gas combustion in small boilers (<10 MBtu/hr), Tables 1.4-1 and 1.4-3, AP-42, Volume I, March, 1998.

7.6 Group 6: Enrobers and Slurry Systems

7.6.1 Description

Enrobers and slurry systems are equipment to prepare and apply non-VOM coatings to a product.

7.6.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 6	Enrobers and Slurry	Equipment Point Numbers:	
	Systems	System A: 25A	None
		System B: 30B	None
		System C: 31C	Wet Collector
		<u>System E</u> : 43E, 49E	Wet Collector for 43E
		Date of Construction:	
		System A: 1975	
		System B: 1996	
		System C: N/A	
		System E: 1995, 1997	

7.6.3 Applicability Provisions and Applicable Regulations

- a. An "affected enrober/slurry system" for the purpose of these unit specific conditions is an equipment to prepare and apply non-VOM coatings to a product.
- b. Each affected enrober/slurry system is subject to 35
 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.6.4 Non-Applicability of Regulations of Concern

Each affected enrober/slurry system is not subject to 35 IAC Part 218, Subpart TT: Other Emission Units, because no VOM containing materials are used in the affected enrober/slurry system.

- 7.6.5 Operational and Production Limits and Work Practices
 - a. The Permittee shall follow good operating practices for the wet scrubbers, including periodic inspection, routine maintenance and prompt repair of defects.
 - b. No VOM containing materials are allowed to use on each affected enrober/slurry system.

7.6.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected enrobers/slurry systems are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 95040076

Item of	Hours of Operation	·	$ ext{PM/PM}_{10}$ $ ext{Emissions}$	
Equipment	(Hr/Yr)_U	(Lb/Hr)	(T/Yr)	
Enrober (43E)	8,160	0.2	0.8	

ii. 96020140

	Hours of	PM/PM_{10}
Item of	Operation	Emissions
Equipment	(Hr/Yr)	(Lb/Hr) (T/Yr)
Enrober (30B)	8,160	0.23 0.92

b. The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in these permit that allow various refinements from the conditions of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits

continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM10 emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.6.7 Testing Requirements

None

7.6.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.6.5 and by keeping appropriate records of Condition 7.6.9.

7.6.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected enrobers/slurry systems to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total raw material throughput, in terms of T/month and T/year.
- b. Hours of operation of each enrober/slurry system, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the air pollution control equipment with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of wet scrubbers, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in 7.6.6(a) and calculated in accordance with compliance procedures in Condition 7.6.12.

f. Annual emissions of particulate matter calculated in accordance with compliance procedures in Condition 7.6.12.

7.6.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.6.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.6.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the wet collectors as required by this section and the work-practices inherent in operation of the affected enrobers and slurry systems.
- b. To determine compliance with Condition 5.5.1 and Condition 7.6.6 for the Enrobers 43E and 31C, emissions of PM from the affected enrobers and slurry systems operated with control devices shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.7 <u>Group 7</u>: Fryers

7.7.1 Description

Fryers are the process units for frying product in food-grade oil.

7.7.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 7	Fryers	Equipment Point Numbers:	
		<u>System A</u> : 19A, 20A	Mist Eliminator for each unit
		Date of Construction:	
		1989 and 1992	

- 7.7.3 Applicability Provisions and Applicable Regulations
 - a. An "affected fryer" for the purpose of these unit specific conditions is a process unit for frying product in food-grade oil.
 - b. Each affected fryer is subject to 35 IAC
 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

7.7.4 Non-Applicability of Regulations of Concern

None

7.7.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the mist eliminators, including periodic inspection, routine maintenance and prompt repair of defects.

7.7.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected fryers are subject to the following:

Emissions and operation of the affected fryers shall not exceed the following limits:

	Hours of	PM/	PM_{10}	
Item of	Operation	Emis	sions	VOM Emissions
Equipment	(Hr/Yr)	(Lb/Hr) (T/Yr)	(T/Yr)
Fryer (19A)	8.100	0.2	0.52	< 0.44
(20A)	8,100	0.2	0.52	< 0.44

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and conditions in this permit that limit PM and VOM emissions from fryers 19A and 20A below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N].

Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

7.7.7 Testing Requirements

None

7.7.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.7.5 and by keeping appropriate records of Condition 7.7.9.

7.7.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected fryers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7) (b) of the Act:

a. Total raw material throughput, in terms of T/month and T/year.

- b. Hours of operation of each fryer, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the mist eliminators with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of mist eliminators, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Annual emissions of particulate matter as calculated in accordance with compliance procedures in Condition 7.7.12.

7.7.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.7.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.7.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the mist eliminators as required by this section and the work-practices inherent in operation of the affected dryers.
- b. To determine compliance with Condition 5.5.1, emissions of PM from the affected dryers shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. Locations, or based on the standard emission factors from AP-42.

7.8 Group 8: Material Transfer Units

7.8.1 Description

Material Transfer Units are system through which raw materials or products are conveyed and controlled by a fabric filters.

7.8.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 9	Material Transfer	Equipment Point Numbers:	
	Units	<u>System B</u> : 47B - 49B	Fabric Filter for
		<u>System D</u> : 35D, 43D, 44D	Each Unit
		<u>System E</u> : 26E, 40E	Fabric Filter for
		System F: 25F	Each Unit
		<u>System G</u> : 47G, 51G	Fabric Filter for
		<u>System H</u> : 34H-36H	Each Unit
		Date of Construction:	
		System B: 2003	
		System D: 1985, 1991 System E: 1992 & 1995	
		System F: 2003	
		System G: 1999 System H: 1994	

7.8.3 Applicability Provisions and Applicable Regulations

- a. An "affected material transfer unit" for the purpose of these unit specific conditions is a material transfer unit through which raw materials or products are conveyed.
- b. Each affected material transfer unit is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises,

exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected material transfer unit is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.8.4 Non-Applicability of Regulations of Concern

None

7.8.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.8.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected material transfer units are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 94030067

	Hours of	PM/PM_{10}
	Operation	Emissions
Item of Equipment	(Hr/Yr)	(Lb/Hr) (T/Yr)
Product Separator (43D)	8,160	0.2 0.8

ii. 94070021

Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM Emissi (Lb/Hr)	ons
Wheat Cleaning Dust Collection (34H, 35H) Central Dust	8,160	1.2	5.90
Collection (36H)	8,160	0.6	2.45

iii. <u>94120102</u>

	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr) (T/Yr)
	Base Dust System (40E)	8,160	0.2 0.8
iv.	99100068		
	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	(47G)	8,160	0.2 0.8
V.	02020089		
	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	(51G, 52G)	8,160	0.4 1.6
vi.	03030017		
	Item of Equipment	Hours of Operation _(Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	Conveyors 1,2,3 (47B - 49B)	8,160	1.20 3.60
vii.	03060041		
	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	Conveyor GAC (25F)	8,160	0.54 2.20

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in these permits that allow various refinements from the condition of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of

Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits do not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM_{10} emissions of each individual unit have been increased [T1R].

Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.8.7 Testing Requirements

None

7.8.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.8.5 and by keeping appropriate records of Condition 7.8.9.

7.8.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected material transfer units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total raw material or product throughput, in terms of T/month and T/year.
- b. Hours of operation of each material transfer unit, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of filters, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.

- e. Monthly and annual emissions of particulate matter for process emission units described in 7.9.6(a) and calculated in accordance with compliance procedures in Condition 7.9.12.
- f. Annual emissions of particulate matter calculated in accordance with compliance procedures in Condition 7.9.12.

7.8.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.8.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected material transfer units without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

The Permittee is authorized to operate the affected material transfer units without the use of the dust collector(s) when processing products that will generate low dust emissions, clogging issues, product cross contamination issues or other production problems, provided the affected material transfer units continue to operate in compliance with the emission limits specified in Condition 7.8.6.

7.8.12 Compliance Procedures

a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected material transfer units.

b. To determine compliance with Condition 5.5.1, emissions of PM from the affected material transfer units shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. locations, or based on the standard emission factors from AP-42.

7.9 Group 9: Packaging Lines

7.9.1 Description

Packaging Lines are systems through which finished product is conveyed. Fabric filters are used as product recovery devices or as collectors of the exhaust.

7.9.2 List of Emission Units and Pollution Control Equipment

			Don't a a d a
			Emission
Emission			Control
Unit	Equipment	Description	Equipment
Group 9	Packaging Lines	Equipment Point Numbers: Systems B, C, D, E: 34E, 35E, 1F, 3F, 4F, 9F-11F, 13F - 24F	
		<u>System G</u> : 53G-55G	Fabric Filter for Each Unit
		Date of Construction:	
		Systems B, C, D, E: 1994, 1995, 2001, 2002, 2003	
		System G: 1994, 2002	

7.9.3 Applicability Provisions and Applicable Regulations

- a. An "affected packaging line" for the purpose of these unit specific conditions is a system through which finished product is conveyed.
- b. Each affected packaging line is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected packaging line is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.9.4 Non-Applicability of Regulations of Concern

None

7.9.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.9.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected packaging lines are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 94030067

	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	Packaging Systems (34E, 35E)	8,160	0.1 0.4
ii.	95060223		
	Item of Equipment	Hours of Operation (Hr/Yr)	
	Packaging Systems (9F-11F)	8,160	0.2 0.8
iii.	02050057		
		Hours of Operation	${ m PM/PM_{10}}$ Emissions

(Hr/Yr)

8,160

8,160

(Lb/Hr) (T/Yr)

0.17

0.2

0.67

0.8

Line 11 (20F)

Item of Equipment

Packaging Line (1F)

02060057 iv.

v.

Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
Packaging Line C (17F - 19F)	8,160	0.1 0.4
03060041		
Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
Packaging Line (21F - 24F)	8 , 160	0.2 0.8

The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in these permits that allow various refinements from the condition of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual \mbox{PM}/\mbox{PM}_{10} emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.9.7 Testing Requirements

None

7.9.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.9.5 and by keeping appropriate records of Condition 7.9.9.

7.9.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected packaging lines to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Total finished product throughput, in terms of T/month and T/year.
- b. Hours of operation of each packaging line, in terms of hr/mo and hr/yr.
- c. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection.
- d. Records of prompt repair of defects of filters, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- e. Monthly and annual emissions of particulate matter for process emission units described in Condition 7.9.6(a) and calculated in accordance with compliance procedures from Condition 7.9.12.
- f. Total monthly and annual emissions of particulate matter from the entire Group 9 and calculated in accordance with compliance procedures from Condition 7.9.12.

7.9.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of

the exceedance or violation and efforts to reduce emissions and future occurrences.

7.9.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected packaging lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for any activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

The Permittee is authorized to operate the affected packaging lines without the use of the dust collector(s) when processing products that will generate low dust emissions, clogging issues, or product cross contamination issues, provide the affected packaging lines continue to operate in compliance with the emission limits specified in Condition 7.9.6.

7.9.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected packaging lines.
- b. To determine compliance with Conditions 5.5.1 and 7.9.6, emissions of PM from the affected packaging lines shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. locations, or based on the standard emission factors from AP-42.

7.10 Group 10: Vacuums

7.10.1 Description

Vacuums systems are sanitation devices used for vacuuming up raw materials or product.

7.10.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 10	Vacuums	Equipment Point Numbers:	1 1
		37E, 45E, 12G-17G	Fabric Filter for
		Date of Construction:	Each Unit
		1995	

7.10.3 Applicability Provisions and Applicable Regulations

- a. An "affected vacuum unit" for the purpose of these unit specific conditions is a system used for vacuuming up raw materials or product.
- b. Each affected vacuum unit is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected storage silo is subject to 35 IAC 212.301, which provides that:

No person shall cause or allow the emissions of fugitive particulate matter from any process, including any material handling or storage activity, that is visible by an observer looking generally toward the zenith at a point beyond the property line of the source.

7.10.4 Non-Applicability of Regulations of Concern

None

7.10.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the filters, including periodic inspection, routine maintenance and prompt repair of defects.

7.10.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, the affected vacuum units are subject to the following:

a. Emissions and operation of the emission units described further shall not exceed the limits established in the following construction permits:

i. 94020001

	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	Vacuum Systems (12G-15G)	8,160	0.4 1.6
ii.	94120102		
	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM_{10} Emissions (Lb/Hr) (T/Yr)
	Central Vacuum System (37E)	8,160	0.1 0.4
iii.	95080076		
	Item of Equipment	Hours of Operation (Hr/Yr)	PM/PM ₁₀ Emissions (Lb/Hr)(T/Yr)
	Vacuum Systems (45E)	8,160	0.1 0.4

b. The above limitations contain revisions to previously issued construction permits mentioned above. The source has requested that the Illinois EPA establish conditions in these permits that allow various refinements from the condition of these construction permits, consistent with the information provided in the CAAPP application. The source has requested

these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, hours of operation and annual PM/PM₁₀ emissions of each individual unit have been increased [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.10.7 Testing Requirements

None

7.10.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling requirements established in Condition 7.10.5 and by keeping appropriate records of Condition 7.10.9.

7.10.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected vacuum units to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. Hours of operation of each vacuum unit, in terms of hr/mo and hr/yr.
- b. Records for periodic inspection of the filters with date, individual performing the inspection, and nature of inspection.
- c. Records of prompt repair of defects of filters, with identification and description of defect, effect on emissions, date identified, date repaired, and nature of repair.
- d. Monthly and annual emissions of particulate matter for process emission units described in Condition 7.10.6(a) and calculated in accordance with compliance procedures from Condition 7.10.12.

e. Total monthly and annual emissions of particulate matter from the entire Group 10 and calculated in accordance with compliance procedures from Condition 7.10.12.

7.10.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences.

7.10.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.10.12 Compliance Procedures

- a. Compliance with the particulate matter limitations in this section is assured and achieved by the proper operation and maintenance of the filters as required by this section and the work-practices inherent in operation of the affected vacuum units.
- b. To determine compliance with Conditions 5.5.1 and 7.10.6, emissions of PM from the affected vacuum units shall be calculated based on the following:

PM Emissions = (Air flow, cfm) x (Estimated Dust Collector Outlet Dust Loading*, gr/scf) x (1 lb/7,000 gr) x (60 minutes/hr).

* As specified by manufacturer or vendor of the filter or wet scrubber, or air testing of the actual equipment, or air testing of similar equipment at this or other General Mills Operations, Inc. locations, or based on the standard emission factors from AP-42.

7.11 Group 11: Coating Lines

7.11.1 Description

Coating lines are used for applying functional coating to the cereal as the final product. Coating lines include dryers, coolers and coating applicators.

7.11.2 List of Emission Units and Pollution Control Equipment

	1		
			Emission
Emission			Control
Unit	Equipment	Description	Equipment
Group 11	Coating	Equipment Point	
	Lines	Numbers:	
			Wet
		Slurry System B:	Collector
		32B - 34B	for
			32B-33B.
			Filter for
			34B.
			Wet
		Slurry System D:	Collector
		37D - 40D, 47D	for 37D
		,	
			None
		Slurry System E:	1,0110
		24/25E, 47/48E	
		21/201, 11/101	
		Date of Construction:	
		Date of Constituentini.	
		System B: 1998	
		System D: 1976	
		System E: 1990	

7.11.3 Applicability Provisions and Applicable Regulations

- a. An "affected coating line" for the purpose of these unit specific conditions is a coating line used for the application of coatings to the cereal and includes dryer, cooler and coating applicator.
- b. Each affected coating line is subject to 35 IAC 212.321(b)(1), which provides that:

No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or

after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 (See also Attachment 2) [35 IAC 212.321(a)].

c. Each affected coating line is subject to the limitations of 35 IAC 218.986(b) which is discussed further in Condition 7.11.6.

7.11.4 Non-Applicability of Regulations of Concern

- a. Each affected coating line is not subject to 35 IAC 218.301, pursuant to 35 IAC 218.986(b).
- b. Air pollution control device(s) is not used to control VOM emission and achieve compliance with VOM emission standards. Therefore, 40 CFR Part 64 "Compliance Assurance Monitoring" is not applicable to the operations of affected coating lines.
- 7.11.5 Operational and Production Limits and Work Practices

The Permittee shall follow good operating practices for the wet collector, including periodic inspection, routine maintenance and prompt repair of defects.

7.11.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, each affected coating line is subject to the following:

- a. For coating lines, the daily-weighted average VOM content shall not exceed 0.42 kg VOM/1 (3.5 lbs VOM/gal) of coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied during any day [35 IAC 218.986(b)].
- b. Total emissions of VOM from affected coating lines (Systems E and D) shall not exceed the following limits:

Daily VOM Emissions	Annual VOM Emissions		
(Lb/Day)	(T/Yr)		
700	42		

The above limitations are being established in this permit pursuant to Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification. The source has requested that the Illinois EPA establish emission limitations and other appropriate terms and

conditions in this permit that limit the VOM emissions from coating lines (Systems E and D) below the levels that would trigger the applicability of these rules, consistent with the information provided in the CAAPP application [T1N]. Compliance with annual limits shall be determined based on the 365 days rolling period.

c. Emissions of VOM from affected coating line (System B) shall not exceed the following limits:

Daily VOM Emissions	Annual VOM Emissions		
(Lb/Day)	(T/Yr)		
500	12		

The above limitations were established in Construction Permit 98060055, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1]. Compliance with annual limits shall be determined from a 365 days rolling period.

7.11.7 Testing Requirements

Testing for VOM content of coatings and other VOM containing materials shall be performed as follows [35 IAC 218.105(a), 218.211(a), and Section 39.5(7)(b) of the Act]:

- a. Upon reasonable request by the Illinois EPA, the VOM content of specific coatings and cleaning solvents used on the each affected coating line shall be determined according to USEPA Reference Method 24 of 40 CFR 60 Appendix A and the procedures of 35 IAC 218.105(a) and 218.211(a).
- b. This testing may be performed by the supplier of a material provided that the supplier provides appropriate documentation for such testing to the Permittee and the Permittee's records pursuant to Condition 7.11.9(e) directly reflect the application of such material and separately account for any additions of solvent.

7.11.8 Monitoring Requirements

Monitoring requirements shall be achieved by fulfilling testing requirements established in Condition 7.11.7 and by keeping appropriate records of Condition 7.11.9.

7.11.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for each affected coating line to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- a. The Permittee shall collect and record all of the following information each day for each affected coating line and maintain this information at the source for a period of three years, as required by 35 IAC 218.991(b)(2):
 - i. The name and identification number of each coating as applied;
 - ii. The weight of VOM per volume and the volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day; and
 - iii. The daily-weighted average VOM content of all coatings as applied on each coating line.
- b. Coating usage (gal/day and gal/yr).
- c. VOM-containing clean-up solvent usage (gal/day and gal/yr).
- d. Density of each VOM-containing clean-up solvent (lb/gal).
- e. VOM content of each clean-up solvent (lb/gal).
- f. Records of the testing of VOM content of each coating and cleaning solvent as tested, pursuant to the conditions of this section, which include the following:
 - i. Identification of material tested;
 - ii. Results of analysis;
 - iii. Documentation of analysis methodology; and
 - iv. Person performing analysis.
- g. Total VOM emissions from all coating lines (lb/day and T/yr) calculated based on the recordkeeping requirements and compliance procedures of Condition 7.11.12.

7.11.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with applicable requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. Pursuant to 35 IAC 218.991(b)(3) the Permittee shall notify the Illinois EPA in the following instances:
 - i. Of a violation of the requirements of 35 IAC Part 218, Subpart TT by sending a copy of any record to the Illinois EPA within 30 days following the occurrence of the violation; and
 - ii. At least 30 calendar days before changing the method of compliance from the use of complying coatings to the use capture systems and control devices, the Permittee shall comply with all requirements of Section 218.991(a).

b. Report of Deviations

If there is an exceedance of the requirements of the limits established in Conditions 5.5.1 and 7.11.6 of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of the exceedance or violation and efforts to reduce emissions and future occurrences [Section 39.5(7)(f)(ii) of the Act].

7.11.11 Operational Flexibility/Anticipated Operating Scenarios

The Permittee is authorized to make the following physical or operational change with respect to the affected coating lines without prior notification to the Illinois EPA or revision of this permit. This condition does not affect the Permittee's obligation to properly obtain a construction permit in a timely manner for the activity constituting construction or modification of the source, as defined in 35 IAC 201.102:

Usage of coatings and clean-up solvents at this source, provided that each affected coating line continues to comply with the conditions of this section.

7.11.12 Compliance Procedures

a. Compliance of each affected line with daily-weighted average VOM limitation in Condition 7.11.6(a) shall be based on the recordkeeping requirements established in Condition 7.11.9 and by use the following equation, as defined in 35 IAC 211.1670:

$$VOM_{w} = \left[\sum_{n=1}^{i} V_{i} C_{i}\right] / V_{t}$$

Where:

- VOMw = The average VOM content of two or more
 coatings as applied each day on a coating line
 in units of kg VOM/l (lb VOM/gal) of coating
 (minus water and any compounds which are
 specifically exempted from the definition of
 VOM);
- V_i = The volume of each coating (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of 1 (gal);
- C_i = The VOM content of each coating as applied
 each day on a coating line in units of kg
 VOM/1 (lb VOM/gal) of coating (minus water and
 any compounds which are specifically exempted
 from the definition of VOM); and
- $V_{\rm t}$ = The total volume of all coatings (minus water and any compounds which are specifically exempted from the definition of VOM) as applied each day on a coating line in units of l (gal).
- b. Compliance of the affected coating lines with VOM emission limitations in Condition 5.5.1 and Condition 7.11.6(b) shall be based on the recordkeeping requirements in Condition 7.11.9 and by use of the formula listed below:
 - i. Emissions from Coating Operation (E1) = Actual
 Coating Usage (gal) x Coating Density (lb/gal)
 x VOM Content of the Coating (wt. %);

Density (lb/gal) x VOM Content of the Clean-up
Solvent (wt. %);

- iii. VOM = E1 + E2
- c. Compliance with Conditions 7.11.12(a) and (b) may be based on material usage data per fiscal month for VOM material used in the coatings along with monthly production formulations for the products containing coatings with VOM.

7.12 Group 12: Boilers

7.12.1 Description

Natural gas-fired boilers which can also burn residual fuel oil #6 are used to produce heat and steam for manufacturing and comfort needs.

7.12.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Equipment	Description	Emission Control Equipment
Group 12	Boilers	Three Boilers (17L-19L) Maximum Heating Capacity:	None
		71 MBtu/hr Each Construction Date: 1965	

7.12.3 Applicability Provisions and Applicable Regulations

- a. An "affected boiler" for the purpose of these unit specific conditions is a natural gas-fired boiler which can also burn residual fuel oil #6 are used to produce heat and steam for manufacturing and comfort needs.
- b. No person shall cause or allow the emission of carbon monoxide into the atmosphere from any fuel combustion emission source with actual heat input greater than 2.9 MW (10 MBtu/hr) to exceed 200 ppm, corrected 50 percent excess air [35 IAC 216.121].
- c. The emissions of particulate matter (PM) into the atmosphere in any one hour period shall not exceed 0.15 kg/MW-hr (0.10 lb/MBtu) of actual heat input from any fuel combustion emission unit using liquid fuel exclusively [35 IAC 212.206].
- d. The emission of sulfur dioxide (SO₂) into the atmosphere in any one hour period from any existing fuel combustion emission unit, burning liquid fuel exclusively shall not exceed 0.46 kg of sulfur dioxide per MW-hr of actual heat input when distillate fuel oil is burned (0.3 lb/MBtu) [35 IAC 214.161(b)].

7.12.4 Non-Applicability of Regulations of Concern

a. The New Source Performance Standard for Small-Industrial-Commercial-Institutional Steam Generating Units, 40 CFR 60, Subpart Dc, applies to units constructed, reconstructed, or modified after June 9, 1989. The affected boilers were constructed prior to June 9, 1989, therefore, these rules do not apply.

- b. The affected boilers are not subject to 35 IAC 217.141, emissions of NO_x from existing fuel combustion emission units in major metropolitan areas, because the actual heat input of each boiler is less than 73.2 MW (250 MBtu/hr).
- c. Pursuant to 35 IAC 218.303, fuel combustion emission units are not subject to 35 IAC 218.301, Use of Organic Material.

7.12.5 Operational and Production Limits and Work Practices

- a. Each affected boiler shall only be operated with natural gas, residual fuel oil #6 or used oil from the cogeneration engines as the fuels.
- b. The Permittee shall not use residual fuel oil (Grades No. 4, 5 and 6 fuels) in these boilers with a sulfur content greater than 1%.
- c. The total annual fuel usage for the entire Group 12 shall not exceed the following limits:
 - i. Natural Gas: 300 mmscf/year
 - ii. Residual Fuel Oil #6: 750,000 gallons/year

7.12.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide emission limitations in Condition 5.5.1, each affected boiler is subject to the following:

a. The affected boilers shall not exceed the following emission limitations:

Pollutants	(Tons/Month)	(Tons/Year)
NO_x	6.0	35.63
SO_2	10.0	58.38
PM/PM_{10}	1.0	5.76
MOV	0.2	0.93
CO	2.4	14.47

b. The above mentioned limits (including from Condition 7.12.5(c)) were established in Construction Permit 04030015, pursuant to 35 IAC Part 203. These limits ensure that the construction and/or modification addressed in the aforementioned Construction Permit does not constitute a new major source or major

modification pursuant to Title I of the CAA, specifically 35 IAC Part 203 [T1].

c. Compliance with annual limits shall be determined based on a rolling 12-month total of data.

7.12.7 Testing Requirements

None

7.12.8 Monitoring Requirements

Monitoring requirements for the sulfur content in the fuel oil shall be achieved by keeping appropriate records of Condition 7.12.9.

7.12.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the boilers to demonstrate compliance with conditions of this permit, pursuant to Section 39.5(7)(b) of the Act:

- Total natural gas usage, in terms of mmscf/month and mmscf/year.
- b. Total residual fuel oil usage for the boilers (gallons/mo and gallons/year).
- c. For each shipment of distillate fuel oil used in the boilers:

The maximum sulfur content (wt. %)

d. Annual emissions of regulated air pollutants as calculated in accordance with compliance procedures in Condition 7.12.12 and supporting calculations.

7.12.10 Reporting Requirements

The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance with the control and operating requirements as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

If there is an exceedance of the requirements of this permit as determined by the records required by this permit, the Permittee shall submit a report to the Illinois EPA's Compliance Section in Springfield, Illinois within 30 days after the exceedance. The report shall include the emissions released in accordance with the recordkeeping requirements, a copy of the relevant records, and a description of

the exceedance or violation and efforts to reduce emissions and future occurrences.

7.12.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.12.12 Compliance Procedures

- a. Compliance with Condition 7.12.3(b) and (c) is assumed to be achieved by work-practices inherent in operation of natural gas-fired/distillate oil-fired boilers and appropriate recordkeeping.
- b. Compliance with Condition 7.12.3(d) is assumed to be achieved by the work-practices in operation of distillate oil-fired boilers with a sulfur content meeting the specification of Condition 7.12.5(b), so that no compliance procedures are set in this permit addressing this regulation.
- c. Compliance with the emission limits shall be based on the recordkeeping requirements in Condition 7.12.9 and the emission factors and formulas listed below:

i. Natural Gas Mode

<u>Pollutant</u>	Emission Factors (lb/10 ⁶ ft ³)
PM	7.6
NO_x	100
SO_2	0.6
MOV	5.5

These are the emission factors for uncontrolled natural gas combustion in small (< 100 MBtu/hr), Tables 1.4-1 and 1.4-2, AP-42, Volume I, March 1998.

Emissions (lb) = Natural Gas Consumed Multiplied by the Appropriate Emission Factor.

ii. Fuel Oil Mode

<u>Pollutant</u>	Emission Factors (lb/10 ³ gallon)
PM	10
NO_x	55
SO_2	157S
VOM	1.28

These are the emission factors for uncontrolled distillate fuel oil combustion in industrial boilers, Tables 1.3-1 and 1.3-2, AP-42, Volume I, September 1998. "S" indicates that the weight % of sulfur in the oil should be multiplied by the value given.

Emissions (lb) = residual fuel oil consumed (gallons) multiplied by the appropriate emission factor.

7.13 Group 13: Cogeneration Engines

7.13.1 Description

Natural gas-fired internal combustion engines are process emission units operated to generate electricity and steam for manufacturing needs.

7.13.2 List of Emission Units and Pollution Control Equipment

Emission			Emission Control
Unit	Equipment	Description	Equipment
Group 13	Cogeneration Engines 1J-8J	Reciprocating Natural Gas-Fired Engines with a Power Output 9.0 MBtu/Hr of Each Engine, (Mod. Caterpillar 3516) Date of Construction: 1994	None

7.13.3 Applicability Provisions and Applicable Regulations

- a. An "affected engine" for the purpose of these unit specific conditions is a natural gas-fired reciprocating engine which is used to generate electricity and steam for manufacturing needs.
- b. The emission of VOM into the atmosphere shall not exceed 3.6 kg/hr (8 lb/hr) from any engine, except as provided in 35 IAC 218.302, 218.303, or 218.304 and the following exemption: If no odor nuisance exists the limitation of 35 IAC 218 Subpart G shall only apply to photochemically reactive material [35 IAC 218.301].

7.13.4 Non-Applicability of Regulations of Concern

Each affected engine is not subject to 35 IAC Part 218, Subpart TT "Other Emission Units", because this emission unit meets the exemption of 35 IAC 218.980(a)(2) and (b)(2)(A).

7.13.5 Operational and Production Limits, and Work Practices

- a. Natural gas shall be the only fuel used in the engines.
- b. Startup Provisions

The Permittee is authorized to operate the engines during startup pursuant to 35 IAC 201.262, as the Permittee has affirmatively demonstrated that all

reasonable efforts have been made to minimize startup emissions, duration of individual starts, and frequency of startups. This authorization is subject to the following:

- i. This authorization only extends for a period of up to two-hours following initial firing of natural gas during each startup event for each engine.
- ii. The Permittee shall take the following measures to minimize startup emissions, the duration of startups and minimize the frequency of startups:
 - A. Implementation of established startup procedures, including preheating an engine prior to startup when sufficient time is available; and
 - B. Operating the engines as peaking units.
- iii. The Permittee shall fulfill applicable recordkeeping and reporting requirements of Condition 7.13.9(c) and 7.13.10(e).

7.13.6 Emission Limitations

In addition to Condition 5.2.2 and the source wide limitations in Condition 5.5.1, the engines are subject to the following:

a. Operation of each affected engine shall not exceed the following limits:

Hours of	f Operation	Firing Rate
(Hr/Mo)	(Hr/Yr)	(MBtu/Hr)
312	3,510	9.025

b. Total emissions of regulated air pollutants from all eight engines shall not exceed the following limits:

PM/	PM_{10}	N	O_{x}	C	10	V	MC
(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)	(Lb/Hr)	(T/Yr)
-							
0.48	0.84	18.48	32.4	39.6	69.5	1.12	2.0

- c. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.
- d. The above limitations contain revisions to previously issued Construction Permit 92080108. The source has

requested that the Illinois EPA establish conditions in these permits that allow various refinements from the condition of these construction permits, consistent with the information provided in the CAAPP application. The source has requested these revisions and has addressed the applicability and compliance of Title I of the CAA, specifically 35 IAC Part 203, Major Stationary Sources Construction and Modification and/or 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in these construction permits does not constitute a new major source or major modification pursuant to these rules. These limits are the primary enforcement mechanism for the equipment and activities permitted in this construction permit and the information in the CAAPP application contains the most current and accurate information for the source. Specifically, these revisions reflect the decrease of allowable emissions PM, NO_x , and VOM and increase emissions of CO [T1R]. Compliance with annual limits shall be determined on a monthly basis from a running total of 12 month of data.

7.13.7 Testing Requirements

None

7.13.8 Monitoring Requirements

None

7.13.9 Recordkeeping Requirements

In addition to the records required by Condition 5.6, the Permittee shall maintain records of the following items for all engines to demonstrate compliance with Conditions 5.5.1 and 7.3.6, pursuant to Section 39.5(7)(b) of the Act:

- a. Annual aggregate NO_x , PM, and VOM emissions from the engines, based on hours of operation and the applicable emission factors, with supporting calculations;
- b. Hours of operation per month and per year for each engine based on the current month's records plus the preceding 11 months;
- c. Records for each startup of an engine that, as a minimum, shall include:

- Date and type of startup, i.e., exercise of engine or startup to generate electricity;
- ii. Duration of the startup, i.e., start time and time startup discontinued or normal operation achieved, i.e., stable operation at load;
- iii. For startup to generate electricity: if normal operation was not achieved within 1 hour, an explanation why startup could not be achieved, including if any startup procedures could not be performed and reason.
- d. A maintenance and repair log for each engine, listing each activity performed with date.

7.13.10 Reporting Requirements

Compliance Section of non-compliance with the operating requirements and emissions of VOM as follows pursuant to Section 39.5(7)(f)(ii) of the Act:

- a. The total emissions of NO_x , PM, CO, and VOM from the engines in excess of the limits specified in Conditions 5.5.1 and 7.13.6 and calculated by using emission factors and equation from Condition 7.13.12 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- b. The hours of operation per year of each engine in excess of the limits specified in Condition 7.13.6 based on the current month's records plus the preceding 11 months within 30 days of such an occurrence.
- c. Reporting for Startups of Engines

The Permittee shall provide an annual report, submitted with the Annual Emission Report, to the Illinois EPA, Compliance Section and Regional Field Office, pursuant to Section 39.5(7)(b) of the Act, concerning startup of engines. At a minimum, this report shall include:

For each engine, the total number of startups to generate electricity.

7.13.11 Operational Flexibility/Anticipated Operating Scenarios

N/A

7.13.12 Compliance Procedures

- a. Compliance with Condition 7.13.3 is assumed to be achieved by the work-practices inherent in the operation of natural gas-fired engines, so that no compliance procedures are set in this permit addressing this regulation;
- b. Compliance with the emission limits in Condition 5.5.1 and 7.13.6 shall be based on the recordkeeping requirements in Condition 7.13.9 and calculated based on the emission factors and formulas listed below:

Engine Emissions (lb) = Hours of Operation x
Allowable Hourly Emission Rate

8.0 GENERAL PERMIT CONDITIONS

8.1 Permit Shield

Pursuant to Section 39.5(7)(j) of the Act, the Permittee has requested and has been granted a permit shield. This permit shield provides that compliance with the conditions of this permit shall be deemed compliance with applicable requirements which were applicable as of the date the proposed permit for this source was issued, provided that either the applicable requirements are specifically identified within this permit, or the Illinois EPA, in acting on this permit application, has determined that other requirements specifically identified are not applicable to this source and this determination (or a concise summary thereof) is included in this permit.

This permit shield does not extend to applicable requirements that are promulgated after **September 8, 2004** (the date of issuance of the draft permit) unless this permit has been modified to reflect such new requirements.

8.2 Applicability of Title IV Requirements (Acid Deposition Control)

This source is not an affected source under Title IV of the CAA and is not subject to requirements pursuant to Title IV of the CAA.

8.3 Emissions Trading Programs

As of the date of issuance of this permit, there are no such economic incentive, marketable permit or emission trading programs that have been approved by USEPA.

- 8.4 Operational Flexibility/Anticipated Operating Scenarios
 - 8.4.1 Changes Specifically Addressed by Permit

Physical or operational changes specifically addressed by the Conditions of this permit that have been identified as not requiring Illinois EPA notification may be implemented without prior notice to the Illinois EPA.

8.4.2 Changes Requiring Prior Notification

The Permittee is authorized to make physical or operational changes that contravene express permit terms without applying for or obtaining an amendment to this permit, provided that [Section 39.5(12)(a)(i) of the Act]:

- a. The changes do not violate applicable requirements;
- b. The changes do not contravene federally enforceable permit terms or conditions that are monitoring

(including test methods), recordkeeping, reporting, or compliance certification requirements;

- c. The changes do not constitute a modification under Title I of the CAA;
- d. Emissions will not exceed the emissions allowed under this permit following implementation of the physical or operational change; and
- e. The Permittee provides written notice to the Illinois EPA, Division of Air Pollution Control, Permit Section, at least 7 days before commencement of the change. This notice shall:
 - i. Describe the physical or operational change;
 - ii. Identify the schedule for implementing the physical or operational change;
 - iii. Provide a statement of whether or not any New Source Performance Standard (NSPS) is applicable to the physical or operational change and the reason why the NSPS does or does not apply;
 - iv. Provide emission calculations which demonstrate that the physical or operational change will not result in a modification; and
 - v. Provide a certification that the physical or operational change will not result in emissions greater than authorized under the Conditions of this permit.

8.5 Testing Procedures

Tests conducted to measure composition of materials, efficiency of pollution control devices, emissions from process or control equipment, or other parameters shall be conducted using standard test methods. Documentation of the test date, conditions, methodologies, calculations, and test results shall be retained pursuant to the recordkeeping procedures of this permit. Reports of any tests conducted as required by this permit or as the result of a request by the Illinois EPA shall be submitted as specified in Condition 8.6.

8.6 Reporting Requirements

8.6.1 Monitoring Reports

If monitoring is required by any applicable requirements or conditions of this permit, a report summarizing the required monitoring results, as specified in the

conditions of this permit, shall be submitted to the Air Compliance Section of the Illinois EPA every six months as follows [Section 39.5(7)(f) of the Act]:

Monitoring Period

Report Due Date

January - June

September 1

July - December

March 1

All instances of deviations from permit requirements must be clearly identified in such reports. All such reports shall be certified in accordance with Condition 9.9.

8.6.2 Test Notifications

Unless otherwise specified elsewhere in this permit, a written test plan for any test required by this permit shall be submitted to the Illinois EPA for review at least 60 days prior to the testing pursuant to Section 39.5(7)(a) of the Act. The notification shall include at a minimum:

- a. The name and identification of the affected unit(s);
- b. The person(s) who will be performing sampling and analysis and their experience with similar tests;
- c. The specific conditions under which testing will be performed, including a discussion of why these conditions will be representative of maximum emissions and the means by which the operating parameters for the source and any control equipment will be determined;
- d. The specific determination of emissions and operation which are intended to be made, including sampling and monitoring locations;
- e. The test method(s) which will be used, with the specific analysis method, if the method can be used with different analysis methods;
- f. Any minor changes in standard methodology proposed to accommodate the specific circumstances of testing, with justification; and
- g. Any proposed use of an alternative test method, with detailed justification.

8.6.3 Test Reports

Unless otherwise specified elsewhere in this permit, the results of any test required by this permit shall be

submitted to the Illinois EPA within 60 days of completion of the testing. The test report shall include at a minimum [Section 39.5(7)(e)(i) of the Act]:

- a. The name and identification of the affected unit(s);
- b. The date and time of the sampling or measurements;
- c. The date any analyses were performed;
- d. The name of the company that performed the tests and/or analyses;
- e. The test and analytical methodologies used;
- f. The results of the tests including raw data, and/or analyses including sample calculations;
- g. The operating conditions at the time of the sampling or measurements; and
- h. The name of any relevant observers present including the testing company's representatives, any Illinois EPA or USEPA representatives, and the representatives of the source.

8.6.4 Reporting Addresses

- a. The following addresses should be utilized for the submittal of reports, notifications, and renewals:
 - i. Illinois EPA Air Compliance Section

Illinois Environmental Protection Agency Bureau of Air Compliance Section (MC 40) P.O. Box 19276 Springfield, Illinois 62794-9276

ii. Illinois EPA - Air Regional Field Office

Illinois Environmental Protection Agency Division of Air Pollution Control 9511 West Harrison Des Plaines, Illinois 60016

iii. Illinois EPA - Air Permit Section

Illinois Environmental Protection Agency Division of Air Pollution Control Permit Section (MC 11) P.O. Box 19506 Springfield, Illinois 62794-9506 iv. USEPA Region 5 - Air Branch

USEPA (AE - 17J)
Air & Radiation Division
77 West Jackson Boulevard
Chicago, Illinois 60604

- b. Unless otherwise specified in the particular provision of this permit, reports shall be sent to the Illinois EPA - Air Compliance Section with a copy sent to the Illinois EPA - Air Regional Field Office.
- 8.7 Obligation to Comply with Title I Requirements

Any term, condition, or requirement identified in this permit by T1, T1R, or T1N is established or revised pursuant to 35 IAC Part 203 or 40 CFR 52.21 ("Title I provisions") and incorporated into this permit pursuant to both Section 39.5 and Title I provisions. Notwithstanding the expiration date on the first page of this permit, the Title I conditions remain in effect pursuant to Title I provisions until the Illinois EPA deletes or revises them in accordance with Title I procedures.

9.0 STANDARD PERMIT CONDITIONS

9.1 Effect of Permit

- 9.1.1 The issuance of this permit does not release the Permittee from compliance with State and Federal regulations which are part of the Illinois State Implementation Plan, as well as with other applicable statutes and regulations of the United States or the State of Illinois or applicable ordinances, except as specifically stated in this permit and as allowed by law and rule [Section 39.5(7)(j)(iv) of the Act].
- 9.1.2 In particular, this permit does not alter or affect the following:
 - a. The provisions of Section 303 (emergency powers) of the CAA, including USEPA's authority under that Section;
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - c. The applicable requirements of the acid rain program consistent with Section 408(a) of the CAA; and
 - d. The ability of USEPA to obtain information from a source pursuant to Section 114 (inspections, monitoring, and entry) of the CAA.
- 9.1.3 Notwithstanding the conditions of this permit specifying compliance practices for applicable requirements, any person (including the Permittee) may also use other credible evidence to establish compliance or noncompliance with applicable requirements.

9.2 General Obligations of Permittee

9.2.1 Duty to Comply

The Permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the CAA and the Act, and is grounds for any or all of the following: enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application [Section 39.5(7)(o)(i) of the Act].

The Permittee shall meet applicable requirements that become effective during the permit term in a timely manner unless an alternate schedule for compliance with the applicable requirement is established.

9.2.2 Duty to Maintain Equipment

The Permittee shall maintain all equipment covered under this permit in such a manner that the performance or operation of such equipment shall not cause a violation of applicable requirements.

9.2.3 Duty to Cease Operation

No person shall cause, threaten or allow the continued operation of any emission unit during malfunction or breakdown of the emission unit or related air pollution control equipment if such operation would cause a violation of an applicable emission standard, regulatory requirement, ambient air quality standard or permit limitation unless such malfunction or breakdown is allowed by a permit condition [Section 39.5(6)(c) of the Act].

9.2.4 Disposal Operations

The source shall be operated in such a manner that the disposal of air contaminants collected by the equipment operations, or activities shall not cause a violation of the Act or regulations promulgated thereunder.

9.2.5 Duty to Pay Fees

The Permittee must pay fees to the Illinois EPA consistent with the fee schedule approved pursuant to Section 39.5(18) of the Act, and submit any information relevant thereto [Section 39.5(7)(o)(vi) of the Act]. The check should be payable to "Treasurer, State of Illinois" and sent to: Fiscal Services Section, Illinois Environmental Protection Agency, P.O. Box 19276, Springfield, Illinois 62794-9276.

9.3 Obligation to Allow Illinois EPA Surveillance

Upon presentation of proper credentials and other documents, the Permittee shall allow the Illinois EPA, or an authorized representative to perform the following [Section 39.5(7)(a) and (p)(ii) of the Act and 415 ILCS 5/4]:

- a. Enter upon the Permittee's premises where an actual or potential emission unit is located; where any regulated equipment, operation, or activity is located or where records must be kept under the conditions of this permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- c. Inspect during hours of operation any sources, equipment (including monitoring and air pollution control

equipment), practices, or operations regulated or required under this permit;

- d. Sample or monitor any substances or parameters at any location:
 - i. At reasonable times, for the purposes of assuring permit compliance; or
 - ii. As otherwise authorized by the CAA, or the Act.
- e. Obtain and remove samples of any discharge or emission of pollutants authorized by this permit; and
- f. Enter and utilize any photographic, recording, testing, monitoring, or other equipment for the purposes of preserving, testing, monitoring, or recording any activity, discharge or emission at the source authorized by this permit.
- 9.4 Obligation to Comply with Other Requirements

The issuance of this permit does not release the Permittee from applicable State and Federal laws and regulations, and applicable local ordinances addressing subjects other than air pollution control.

9.5 Liability

9.5.1 Title

This permit shall not be considered as in any manner affecting the title of the premises upon which the permitted source is located.

9.5.2 Liability of Permittee

This permit does not release the Permittee from any liability for damage to person or property caused by or resulting from the construction, maintenance, or operation of the sources.

9.5.3 Structural Stability

This permit does not take into consideration or attest to the structural stability of any unit or part of the source.

9.5.4 Illinois EPA Liability

This permit in no manner implies or suggests that the Illinois EPA (or its officers, agents or employees) assumes any liability, directly or indirectly, for any loss due to damage, installation, maintenance, or operation of the source.

9.5.5 Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege [Section 39.5(7)(o)(iv) of the Act].

9.6 Recordkeeping

9.6.1 Control Equipment Maintenance Records

A maintenance record shall be kept on the premises for each item of air pollution control equipment. As a minimum, this record shall show the dates of performance and nature of preventative maintenance activities.

9.6.2 Records of Changes in Operation

A record shall be kept describing changes made at the source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes [Section 39.5(12)(b)(iv) of the Act].

9.6.3 Retention of Records

- a. Records of all monitoring data and support information shall be retained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit [Section 39.5(7)(e)(ii) of the Act].
- b. Other records required by this permit shall be retained for a period of at least 5 years from the date of entry unless a longer period is specified by a particular permit provision.

9.7 Annual Emissions Report

The Permittee shall submit an annual emissions report to the Illinois EPA, Compliance Section no later than May 1 of the following year, as required by 35 IAC Part 254.

9.8 Requirements for Compliance Certification

Pursuant to Section 39.5(7)(p)(v) of the Act, the Permittee shall submit annual compliance certifications. The compliance certifications shall be submitted no later than May 1 or more frequently as specified in the applicable requirements or by permit condition. The compliance certifications shall be

submitted to the Air Compliance Section, Air Regional Field Office, and USEPA Region 5 - Air Branch. The addresses for the submittal of the compliance certifications are provided in Condition 8.6.4 of this permit.

- a. The certification shall include the identification of each term or condition of this permit that is the basis of the certification; the compliance status; whether compliance was continuous or intermittent; the method(s) used for determining the compliance status of the source, both currently and over the reporting period consistent with the conditions of this permit.
- b. All compliance certifications shall be submitted to USEPA Region 5 in Chicago as well as to the Illinois EPA.
- c. All compliance reports required to be submitted shall include a certification in accordance with Condition 9.9.

9.9 Certification

Any document (including reports) required to be submitted by this permit shall contain a certification by a responsible official of the Permittee that meets the requirements of Section 39.5(5) of the Act [Section 39.5(7)(p)(i) of the Act]. An example Certification by a Responsible Official is included as an attachment to this permit.

9.10 Defense to Enforcement Actions

9.10.1 Need to Halt or Reduce Activity Not a Defense

It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit [Section 39.5(7)(o)(ii) of the Act].

9.10.2 Emergency Provision

- a. An emergency shall be an affirmative defense to an action brought for noncompliance with the technologybased emission limitations under this permit if the following conditions are met through properly signed, contemporaneous operating logs, or other relevant evidence:
 - i. An emergency occurred as provided in Section 39.5(7)(k) of the Act and the Permittee can identify the cause(s) of the emergency. Normally, an act of God such as lightning or flood is considered an emergency;

- ii. The permitted source was at the time being properly operated;
- iii. The Permittee submitted notice of the emergency to the Illinois EPA within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a detailed description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
- iv. During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission limitations, standards, or regulations in this permit.
- b. This provision is in addition to any emergency or upset provision contained in any applicable requirement. This provision does not relieve a Permittee of any reporting obligations under existing federal or state laws or regulations.

9.11 Permanent Shutdown

This permit only covers emission units and control equipment while physically present at the indicated source location(s). Unless this permit specifically provides for equipment relocation, this permit is void for the operation or activity of any item of equipment on the date it is removed from the permitted location(s) or permanently shut down. This permit expires if all equipment is removed from the permitted location(s), notwithstanding the expiration date specified on this permit.

9.12 Reopening and Reissuing Permit for Cause

9.12.1 Permit Actions

This permit may be modified, reopened, and reissued, for cause pursuant to Section 39.5(15) of the Act. The filing of a request by the Permittee for a permit modification, revocation, and reissuance, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition [Section 39.5(7)(o)(iii) of the Act].

9.12.2 Reopening and Revision

This permit must be reopened and revised if any of the following occur [Section 39.5(15)(a) of the Act]:

- a. Additional requirements become applicable to the equipment covered by this permit and three or more years remain before expiration of this permit;
- b. Additional requirements become applicable to an affected source for acid deposition under the acid rain program;
- c. The Illinois EPA or USEPA determines that this permit contains a material mistake or inaccurate statement when establishing the emission standards or limitations, or other terms or conditions of this permit; and
- d. The Illinois EPA or USEPA determines that this permit must be revised to ensure compliance with the applicable requirements of the Act.

9.12.3 Inaccurate Application

The Illinois EPA has issued this permit based upon the information submitted by the Permittee in the permit application. Any misinformation, false statement or misrepresentation in the application shall be grounds for revocation under Section 39.5(15)(b) of the Act.

9.12.4 Duty to Provide Information

The Permittee shall furnish to the Illinois EPA, within a reasonable time specified by the Illinois EPA any information that the Illinois EPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. Upon request, the Permittee shall also furnish to the Illinois EPA copies of records required to be kept by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to USEPA along with a claim of confidentiality [Section 39.5(7)(o)(v) of the Act].

9.13 Severability Clause

The provisions of this permit are severable, and should any one or more be determined to be illegal or unenforceable, the validity of the other provisions shall not be affected. The rights and obligations of the Permittee shall be construed and enforced as if this permit did not contain the particular provisions held to be invalid and the applicable requirements underlying these provisions shall remain in force [Section 39.5(7)(i) of the Act].

9.14 Permit Expiration and Renewal

The right to operate terminates on the expiration date unless the Permittee has submitted a timely and complete renewal application. For a renewal to be timely it must be submitted no later than 9 and no sooner than 12 months prior to expiration. The equipment may continue to operate during the renewal period until final action is taken by the Illinois EPA, in accordance with the original permit conditions [Section 39.5(5)(1), (n), and (o) of the Act].

10.0 ATTACHMENTS

- 10.1 Attachment 1 Allowable Emissions of Particulate Matter
 - 10.1.1 Process Emission Units for Which Construction or Modification Commenced Prior to April 14, 1972
 - a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced prior to April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.322 [35 IAC 212.322(a)].
 - b. The emissions of particulate matter into the atmosphere in any one hour period from the affected unit shall not exceed the allowable emission rates specified in the following equation:

$$E = C + A (P)^B$$

Where:

P = Process weight rate

E = Allowable emission rate

i. For process weight rates up to 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	1.985	4.10
В	0.67	0.67
С	0	0

ii. For process weight rates in excess of 27.2 Mg/hr (30 T/hr):

	Metric	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	25.21	55.0
В	0.11	0.11
C	-18.4	-40.0

c. Limits for Process Emission Units for which Construction or Modification Commenced Prior to April 14, 1972 [35 IAC 212.322(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.27	0.05	0.55
0.1	0.42	0.10	0.87
0.2	0.68	0.20	1.40
0.3	0.89	0.30	1.83
0.4	1.07	0.40	2.22
0.5	1.25	0.50	2.58
0.7	1.56	0.75	3.38
0.9	1.85	1.00	4.10
1.8	2.9	2.00	6.52
2.7	3.9	3.00	8.56
3.6	4.7	4.00	10.40
4.5	5.4	5.00	12.00
9.0	8.7	10.00	19.20
13.0	11.1	15.00	25.20
18.0	13.8	20.00	30.50
23.0	16.2	25.00	35.40
27.2	18.5	30.00	40.00
32.0	18.8	35.00	41.30
36.0	19.3	40.00	42.50
41.0	19.8	45.00	43.60
45.0	20.2	50.00	44.60
90.0	23.2	100.00	51.20
140.0	25.3	150.00	55.40
180.0	26.5	200.00	58.60
230.0	27.7	250.00	61.00
270.0	28.5	300.00	63.10
320.0	29.4	350.00	64.90
360.0	30.0	400.00	66.20
400.0	30.6	450.00	67.70
454.0	31.3	500.00	69.00

- 10.1.2 Process Emission Units for Which Construction or Modification Commenced On or After April 14, 1972
 - a. No person shall cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321 [35 IAC 212.321(a)].
 - b. The emissions of particulate matter into the atmosphere in any one hour period from the affected

coating lines shall not exceed the allowable emission rates specified in the following equation:

$$E = A (P)^B$$

Where:

- P = Process weight rate
- E = Allowable emission rate
- i. For process weight rates of 408 Mg/hr (450 T/hr):

	Metric	English		
P	Mg/hr	T/hr		
E	kg/hr	lbs/hr		
A	1.214	2.54		
В	0.534	0.534		

ii. For process weight rates in excess of 408 Mg/hr (450 T/hr):

	<u>Metric</u>	English
P	Mg/hr	T/hr
E	kg/hr	lbs/hr
A	11.42	24.8
В	0.16	0.16

c. Limits for Process Emission Units for which Construction or Modification Commenced On or After April 14, 1972 [35 IAC 212.321(c)]:

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
0.05	0.25	0.05	0.55
0.1	0.29	0.10	0.77
0.2	0.42	0.2	1.10
0.3	0.64	0.30	1.35
0.4	0.74	0.40	1.58
0.5	0.84	0.50	1.75
0.7	1.00	0.75	2.40
0.9	1.15	1.00	2.60
1.8	1.66	2.00	3.70
2.7	2.1	3.00	4.60
3.6	2.4	4.00	5.35
4.5	2.7	5.00	6.00
9.0	3.9	10.00	8.70
13.0	4.8	15.00	10.80
18.0	5.7	20.00	12.50
23.0	6.5	25.00	14.00

Metric		English	
P	E	P	E
Mg/hr	kg/hr	T/hr	lb/hr
27.0	7.1	30.00	15.60
32.0	7.7	35.00	17.00
36.0	8.2	40.00	18.20
41.0	8.8	45.00	19.20
45.0	9.3	50.00	20.50
90.0	13.4	100.00	29.50
140.0	17.0	150.00	37.00
180.0	19.4	200.00	43.00
230.0	22.0	250.00	48.50
270.0	24.0	300.00	53.00
320.0	26.0	350.00	58.00
360.0	28.0	400.00	62.00
408.0	30.1	450.00	66.00
454.0	30.4	500.00	67.00

10.2	Attachment	2	- Example	Certification	by	а	Responsible	Official
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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:	
Name:	
Official Title:	
Telephone No.:	
Date Signed:	

10.3 Attachment 3 - Guidance on Revising This Permit

The Permittee must submit an application to the Illinois EPA using the appropriate revision classification in accordance with Sections 39.5(13) and (14) of the Act and 35 IAC 270.302. Specifically, there are currently three classifications for revisions to a CAAPP permit. These are:

- 1. Administrative Permit Amendment;
- 2. Minor Permit Modification; and
- 3. Significant Permit Modification.

The Permittee must determine, request, and submit the necessary information to allow the Illinois EPA to use the appropriate procedure to revise the CAAPP permit. A brief explanation of each of these classifications follows.

1. Administrative Permit Amendment

- Corrects typographical errors;
- Identifies a change in the name, address, or phone number of any person identified in the permit, or provides a similar minor administrative change at the source;
- Requires more frequent monitoring or reporting by the Permittee;
- Allows for a change in ownership or operational control of the source where no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittees has been submitted to the Illinois EPA;
- Incorporates into the CAAPP permit a construction permit, provided the conditions of the construction permit meet the requirements for the issuance of CAAPP permits; or
- Incorporates into the CAAPP permit revised limitations or other requirements resulting from the application of an approved economic incentives rule, marketable permits rule, or generic emissions trading rule.

2. Minor Permit Modification

• Do not violate any applicable requirement;

- Do not involve significant changes to existing monitoring, reporting, or recordkeeping requirements in the permit;
- Do not require a case-by-case determination of an emission limitation or other standard, or a source-specific determination of ambient impacts, or a visibility or increment analysis;
- Do not seek to establish or change a permit term or condition for which there is no corresponding underlying requirement and which avoids an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - A federally enforceable emissions cap assumed to avoid classification as a modification under any provision of Title I of the CAA; and
 - An alternative emissions limit approved pursuant to regulations promulgated under Section 112(i)(5) of the CAA.
- Are not modifications under any provision of Title I of the CAA; and
- Are not required to be processed as a significant permit modification.

An application for a minor permit modification shall include the following:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
- The source's suggested draft permit/conditions;
- Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used; and
- Information as contained on form 271-CAAPP for the Illinois EPA to use to notify USEPA and affected States.

3. Significant Permit Modification

- Applications that do not qualify as either minor permit modifications or as administrative permit amendments;
- Applications requesting a significant change in existing monitoring permit terms or conditions;
- Applications requesting a relaxation of reporting or recordkeeping requirements; and
- Cases in which, in the judgment of the Illinois EPA, action on an application for modification would require decisions to be made on technically complex issues.

An application for a significant permit modification shall include the following:

• A detailed description of the proposed change(s), including all physical changes to equipment, changes in the method of operation, changes in emissions of each pollutant, and any new applicable requirements which will apply as a result of the proposed change. Note that the Permittee need only submit revised forms for equipment and operations that will be modified.

The Illinois EPA requires the information on the following appropriate forms to be submitted in accordance with the proper classification:

- Form 273-CAAPP, REQUEST FOR ADMINISTRATIVE PERMIT AMENDMENT FOR CAAPP PERMIT; or
- Form 271-CAAPP, MINOR PERMIT MODIFICATION FOR CAAPP PERMIT; or
- Form 200-CAAPP, APPLICATION FOR CAAPP PERMIT (for significant modification).

Application forms can be obtained from the Illinois EPA website at $\frac{\text{http://www.epa.state.il.us/air/forms}}{\text{http://www.epa.state.il.us/air/forms}}$.

Note that the request to revise the permit must be certified for truth, accuracy, and completeness by a responsible official.

Note that failure to submit the required information may require the Illinois EPA to deny the application. The Illinois EPA reserves the right to require that additional information be submitted as needed to evaluate or take final action on applications pursuant to Section 39.5(5)(g) of the Act and 35 IAC 270.305.



Illinois Environmental Protection Agency
Division Of Air Pollution Control -- Permit Section
P.O. Box 19506
Springfield, Illinois 62794-9506

			For I	llinois EPA use only	
Application For Construction Permit (For CAAPP Sources Only)		I.D. number:			
		Permit number:			
			Date received:		
	orm is to be used by CAAPP sources sary information and completed CAA			a construction permit. Please attach other fication project.	
			nformation	· ,	
1.	Source name:				
2.	Source street address:				
3.	City:			4. Zip code:	
5.	Is the source located within	city limits?		☐ Yes ☐ No	
6.	Township name:	7. County:		8. I.D. number:	
		Owner In	nformation		
9.	Name:				
40	A 1.1				
10.	Address:				
11.	City:	12. State:		13. Zip code:	
44		Information ((if different fro	om owner)	
14.	Name				
15.	Address:				
16.	City:	17. State:		18. Zip code:	
l					
			Information		
19.	Who is the applicant? Owner Derator		ll correspondence] Owner (to: (check one) Operator	
21.	21. Attention name and/or title for written correspondence:				
22. Technical contact person for application: 23. Co			23. Cont	act person's telephone number:	

This Agency is authorized to require and you must disclose this information under 415 ILCS 5/39. Failure to do so could result in the application being denied and penalties under 415 ILCS 5 et seq. It is not necessary to use this form in providing this information. This form has been approved by the forms management center.

Summary Of Application Contents					
24.	Does the application address whether the proposed project would constitute a new major source or major modification under each of the following programs:	☐ Yes ☐ No			
	 a) Non-attainment New Source Review – 35 IAC Part 203; b) Prevention of Significant Deterioration (PSD) – 40 CFR 52.21; c) Hazardous Air Pollutants: Regulations Governing Constructed or Reconstructed Major Sources – 40 CFR Part 63? 				
25.	Does the application identify and address all applicable emissions standards, including those found in the following: a) Board Emission Standards – 35 IAC Chapter I, Subtitle B; b) Federal New Source Performance Standards – 40 CFR Part 60; c) Federal Standards for Hazardous Air Pollutants – 40 CFR Parts 61 and 63?	☐ Yes ☐ No			
26.	Does the application include a process flow diagram(s) showing all emission units and control equipment, and their relationship, for which a permit is being sought?	☐ Yes ☐ No			
27.	Does the application include a complete process description for the emission units and control equipment for which a permit is being sought?	☐ Yes ☐ No			
28.	Does the application include the information as contained in completed CAAPP forms for all appropriate emission units and air pollution control equipment, listing all applicable requirements and proposed exemptions from otherwise applicable requirements, and identifying and describing any outstanding legal actions by either the USEPA or the Illinois EPA? Note: The use of "APC" application forms is not appropriate for applications for CAAPP sources. CAAPP forms should be used to supply information.	☐ Yes ☐ No			
29.	If the application contains TRADE SECRET information, has such information been properly marked and claimed, and have two separate copies of the application suitable for public inspection and notice been submitted, in accordance with applicable rules and regulations?	☐ Yes ☐ No ☐ Not Applicable, No TRADE SECRET information in this application			
Note 1	: Answering "No" to any of the above may result in the application being deemed incomplete.				
	Signature Block				
	This certification must be signed by a responsible official. Applications with certification will be returned as incomplete.	out a signed			
30.	I certify under penalty of law that, based on information and belief formed a inquiry, the statements and information contained in this application are true complete. Authorized Signature:				
	AUTHORIZED SIGNATURE TITLE OF SI	IGNATORY			
	TYPED OR PRINTED NAME OF SIGNATORY DATE	′ TE			

Note 2: An operating permit for the construction/modification permitted in a construction permit must be obtained by applying for the appropriate revision to the source's CAAPP permit, if necessary.

10.5 Attachment 5 Guidance on Renewing This Permit

Timeliness - Pursuant to Section 39.5(5)(n) of the Act and 35 IAC 270.301(d), a source must submit to the Illinois EPA a complete CAAPP application for the renewal of a CAAPP permit not later than 9 months before the date of permit expiration of the existing CAAPP permit in order for the submittal to be deemed timely. Note that the Illinois EPA typically sends out renewal notices approximately 18 months prior to the expiration of the CAAPP permit.

The CAAPP application must provide all of the following information in order for the renewal CAAPP application to be deemed complete by the Illinois EPA:

- A completed renewal application form 200-CAAPP, APPLICATION FOR CAAPP PERMIT.
- 2. A completed compliance plan form 293-CAAPP, COMPLIANCE PLAN/SCHEDULE OF COMPLIANCE FOR CAAPP PERMIT.
- A completed compliance certification form 296-CAAPP, COMPLIANCE CERTIFICATION, signed by the responsible official.
- 4. Any applicable requirements that became effective during the term of the permit and that were not included in the permit as a reopening or permit revision.
- 5. If this is the first time this permit is being renewed and this source has not yet addressed CAM, the application should contain the information on form 464-CAAPP, COMPLIANCE ASSURANCE MONITORING (CAM) PLAN.
- 6. Information addressing any outstanding transfer agreement pursuant to the ERMS.
- 7. If operations of an emission unit or group of emission units remain unchanged and are accurately depicted in previous submittals, the application may contain a letter signed by a responsible official that requests incorporation by reference of existing information previously submitted and on file with the Illinois EPA. This letter must also include a statement that information incorporated by reference is also being certified for truth and accuracy by the responsible official's signing of the form 200-CAAPP, APPLICATION FOR CAAPP PERMIT and the form 296-CAAPP, COMPLIANCE CERTIFICATION. The boxes should be marked yes on form 200-CAAPP, APPLICATION FOR CAAPP PERMIT, as existing information is being incorporated by reference.

- b. If portions of current operations are not as described in previous submittals, then in addition to the information above for operations that remain unchanged, the application must contain the necessary information on all changes, e.g., discussion of changes, new or revised CAAPP forms, and a revised fee form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT, if necessary.
- 8. Information about all off-permit changes that were not prohibited or addressed by the permit to occur without a permit revision and the information must be sufficient to identify all applicable requirements, including monitoring, recordkeeping, and reporting requirements, for such changes.
- 9. Information about all changes made under 40 CFR 70.4(b)(12)(i) and (ii) that require a 7-day notification prior to the change without requiring a permit revision.

The Illinois EPA will review all applications for completeness and timeliness. If the renewal application is deemed both timely and complete, the source shall continue to operate in accordance with the terms and conditions of its CAAPP permit until final action is taken on the renewal application.

Notwithstanding the completeness determination, the Illinois EPA may request additional information necessary to evaluate or take final action on the CAAPP renewal application. If such additional information affects your allowable emission limits, a revised form 292-CAAPP, FEE DETERMINATION FOR CAAPP PERMIT must be submitted with the requested information. The failure to submit to the Illinois EPA the requested information within the time frame specified by the Illinois EPA, may force the Illinois EPA to deny your CAAPP renewal application pursuant to Section 39.5 of the Act.

Application forms may be obtained from the Illinois EPA website at http://www.epa.state.il.us/air/forms.html.

If you have any questions regarding this matter, please contact a permit analyst at 217/782-2113.

Mail renewal applications to:

Illinois Environmental Protection Agency Division of Air Pollution Control Permit Section (MC 11) P.O. Box 19506 Springfield, Illinois 62794-9506

AB:psj